

EXHIBIT 13



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"I will stand for my client's rights.
I am a trial lawyer."
-Ron Motley (1944-2013)

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VIA ELECTRONIC MAIL

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RE: *In Re National Prescription Opioid Litigation*; Case No. 17-md-2804
The County of Summit, Ohio, et al. v. Purdue Pharma L.P., et al.; Case No. 18-op-45090
Responses to Pharmacy Defendants' Interrogatories

Counsel:

Enclosed please find Summit County and the City of Akron, Ohio Plaintiff's First Amended Responses and Objections to Pharmacy Defendants' First Set of Interrogatories.

Sincerely,

/s/ Jodi Westbrook Flowers

Jodi Westbrook Flowers

Enclosure

cc: Plaintiffs' Liaison Counsel, Peter Weinberger

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*

Case No. 18-op-45090

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**SUMMIT COUNTY AND CITY OF AKRON, OHIO PLAINTIFFS' FIRST AMENDED
RESPONSES AND OBJECTIONS TO THE NATIONAL RETAIL PHARMACY
DEFENDANTS' FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Case Management Order in *In re National Prescription Opiate Litigation*, No. 1:17-cv-2804 (Dkt. No. 232), the County of Summit, Ohio (“Summit County”), and the City of Akron, Ohio (“City of Akron,” and together, “Plaintiff”) hereby respond to The National Retail Pharmacy Defendants’¹ First Set of Interrogatories (the “Interrogatories” and, each individually, an “Interrogatory”), as follows:

OBJECTIONS

The following objections apply to each Interrogatory. To the extent that certain specific objections are cited in response to an individual Interrogatory, those specific objections are provided because they are applicable to that specific Interrogatory and are not a waiver of the other objections applicable to information falling within the scope of such Interrogatory.

1. Plaintiff objects to each Interrogatory to the extent they are overly broad, vague, unduly burdensome, seek information that is not relevant to any party’s claim or defense, or seek

¹ The National Retail Pharmacy Defendants include the following defendants: CVS Indiana, LLC, CVS Rx Services, Inc., Rite Aid of Maryland, dba Mid-Atlantic Customer Service Center, Walgreens Boots Alliance, Inc., and Walmart Inc. fka Wal-Mart Stores, Inc.

to impose obligations or require actions beyond those required by the Federal Rules of Civil Procedure, the ESI Protocol entered in this matter, or the Local Rules of the United States District Court of the Northern District of Ohio.

2. Plaintiff objects to each Interrogatory to the extent it seeks information restricted from dissemination pursuant to court order, statute, or regulation. Further, any response made by Plaintiff to the Interrogatories is not intended to waive, and does not constitute any waiver of, any objection to the admissibility, authenticity, competency, or relevance of the information produced or identified.

3. These responses are made solely for the purpose of and in relation to this action. Each answer is given subject to all appropriate objections, which would require the exclusion at trial of any statement contained or document provided herein. All such objections and the grounds therefore are hereby reserved.

4. No admission of any nature whatsoever is to be implied or inferred in these responses. The fact that any of the Interrogatories herein may have been answered should not be taken as an admission or a concession of the existence of any facts set forth or assumed by the Interrogatories, or that such answer constitutes evidence of any fact thus set forth or assumed.

5. Plaintiff objects to each Interrogatory to the extent Plaintiff has not yet completed its investigation of the facts relating to this action and has not yet completed its preparation for trial. Accordingly, these responses are necessarily limited in nature, and reflect only that information known to Plaintiff at this time.

6. Plaintiff objects to each Interrogatory to the extent they purport to require Plaintiff to produce documents that are in the public domain or otherwise available to Defendants as easily from other sources as from Plaintiff.

7. Plaintiff objects to each Interrogatory to the extent they purport to state facts, assumptions, or characterizations that are disputed.

8. Plaintiff objects to each Interrogatory to the extent they seek information more appropriately obtained through other methods of discovery.

9. Plaintiff objects to each Interrogatory to the extent that they seek information that is proprietary or confidential or that is protected from discovery as attorney work product and attorney-client communication, information gathered or prepared in anticipation of litigation, the public interest privilege, law enforcement privilege, public official privilege, and/or by any other privilege or immunity from disclosure (collectively, “Privileged Information”).

10. Plaintiff objects to each Interrogatory to the extent they seek confidential investigative, personal, or health information in Plaintiff’s possession, custody, or control (collectively, “Confidential Information”).

11. Whenever in the responses Plaintiff employs the phrase “subject to and without waiving all objections,” Plaintiff is responding to the Interrogatory as it may be narrowed by its general and specific objections and without waiver of any objection.

12. Any response stating that Plaintiff will produce documents shall be deemed followed by the phrase “as are within Plaintiff’s possession, custody, or control.”

13. Plaintiff objects to each Interrogatory to the extent that they imply the existence of facts or circumstances that do not or did not exist, and to the extent that it states or assumes legal conclusions. In providing these objections and responses, Plaintiff does not admit the factual or legal premise of any Interrogatory.

14. Plaintiff’s lack of objection to any specific Interrogatory is not an admission that Plaintiff has possession, custody, or control over any such information; and any statement by

Plaintiff that it will search for or produce documents does not mean that Plaintiff has possession, custody, or control of any responsive document, or that any such documents exist.

15. Plaintiff objects to each Interrogatory to the extent they seek information that is not within Plaintiff's possession, custody, or control, seek documents that do not already exist, or which purport to require a response by Plaintiff on behalf of an entity or individual other than Plaintiff.

16. Plaintiff reserves the right to supplement, revise, correct, or clarify its responses and objections in the event that additional information becomes available.

17. Plaintiff intends to complete its responses by the time agreed upon by the parties for the completion of discovery, or by the date ordered by the Court. Upon request by the requesting party, Plaintiff is willing to meet and confer regarding its responses to the Interrogatories. All final decisions regarding whether any information will be withheld pursuant to any objection shall be made, and notice thereof provided, before the completion of written discovery.

18. No Federal Rule of Civil Procedure prevents Plaintiff from submitting collective answers to collective Interrogatories. Where the responses and objections to these Interrogatories are the same for each of Summit County and the City of Akron, a collective response herein will in no way prejudice Defendants. In each instance where the answers are not the same for each of Summit County and the City of Akron, any differences have been set forth herein with particularity.

NON-WAIVER

1. Plaintiff's responses are made without waiving its right to object (on the grounds of relevancy, hearsay, materiality, competency, or any other ground) to the use of its responses in any subsequent stage or proceeding in this action or any other action.

2. If Plaintiff, in response to any Interrogatory, inadvertently discloses information that is or could be the subject of the objections stated herein, such disclosure is not intended to be, nor is it deemed to be, a waiver of the objections with respect to such information disclosed.

3. Plaintiff's failure to object to a specific Interrogatory on a particular ground or grounds shall not be construed as a waiver of its rights to object on any additional grounds.

4. Plaintiff responds herein based upon information it has been reasonably able to gather at the time of making these responses. Plaintiff reserves its right to amend and/or to supplement its objections and responses to the Interrogatories, consistent with further investigation and discovery.

SPECIFIC RESPONSES AND OBJECTIONS

Interrogatory 1

State the years during which You claim each National Retail Pharmacy Defendant engaged in the conduct for which You seek damages.

Response 1

Plaintiff objects that this Interrogatory contains a reference to an ambiguous phrase, "conduct." Subject to and without waiving all objections, Plaintiff incorporates the allegations in its Corrected Second Amended Complaint and Jury Demand ("Second Amended Complaint"). In addition, Plaintiff's investigation of its damages caused by the Defendants is ongoing and will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure.

Subject to and without waiving any objections, Plaintiff responds that every year a given National Retail Pharmacy Defendant distributed opioids is relevant. Plaintiff recently received the ARCOS data from the Department of Justice, to which the Distributor Defendants objected, which reveals conduct dating back to January 2006. Plaintiff believes the Distributor Defendants

engaged in actionable conduct dating back to at least this timeframe and have reason to believe discovery and Plaintiff's investigation will reveal additional conduct dating back to the introduction of OxyContin into the national marketplace. Plaintiff further responds that the years from 1995 to the present are the relevant time period for the conduct alleged, and all years from 2006 to the present are the relevant time period for the measure of damages (in addition to abatement or other remedies). Plaintiff reserves the right to supplement, amend, or modify this response as discovery proceeds.

Interrogatory 2

Identify each prescription upon which You base, or which You contend supports, Your claims in this case. For each prescription, identify the prescriber, dispensing pharmacy, dispensing pharmacist, and dispensing date, and explain how it supports Your claims.

Response 2

Plaintiff objects to this Interrogatory as overly broad in seeking to identify "each prescription," the "dispensing pharmacy," "dispensing pharmacist," and "dispensing date" and how each individual prescription supports Plaintiff's claims. Plaintiff objects to this Interrogatory as overly broad and unduly burdensome as propounded, and in that it calls for Plaintiff to identify the specific conduct of each Defendant. Plaintiff objects to this request in that it calls for information in the National Retail Pharmacy Defendants' possession or control, or just as available to Defendants from their own business dealings or third-party sources as may be available to Plaintiff. Plaintiff also objects to this Interrogatory as placing an undue burden not proportional to the needs of the case. Plaintiff further responds that this Interrogatory is contention discovery more appropriately answered once discovery is complete. *See* Fed. R. Civ. P. 33(a)(2). In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert

witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure.

Subject to and without waiving all objections, Plaintiff responds that Plaintiff is not representing the interests of any individuals who were harmed by opioids or the interests of any payor of opioid prescription costs; nor has Plaintiff alleged any False Claims Act counts or other claims that justify the burden of an Interrogatory this broad in scope. Plaintiff further objects to this Interrogatory because it is not proportional to the needs of the case considering (1) the lack of relevance or importance of the materials to the claims and defenses in this litigation, as described above, and (2) the substantial cost to identify and describe responsive materials, which would cause substantial harm to the privacy interests held by the individuals whose private medical files are the subject of this request. Plaintiff responds that to the extent it has documentation on “each prescription” under its custody or control, it has been or will be produced.

Subject to and without waiving all objections, Plaintiff identifies the following documents containing information responsive to this Interrogatory pursuant to Federal Rule of Civil Procedure 33(d):

SUMMIT_001146952
SUMMIT_001474837 – SUMMIT_001474874
SUMMIT_000290411
SUMMIT_001233906
AKRON_000909837 – AKRON_000909838
AKRON_000004351 – AKRON_000004352

Plaintiff reserves the right to amend, supplement or modify this response as discovery proceeds and based upon further investigation. As discovery continues, Plaintiff will produce a trial witness list and expert reports pursuant to the scheduling orders in this case.

Interrogatory 3

Identify each prescription the filling of which caused or led to harm for which You seek to recovery in this case. For each prescription, identify the prescriber, dispensing pharmacy, dispensing pharmacist, and dispensing date, and explain how it supports Your claims.

Response 3

Plaintiff objects to this Interrogatory as to the over breadth and burden of identifying “each prescription,” the “dispensing pharmacy,” “dispensing pharmacist,” and “dispensing date” and how each individual prescription supports Plaintiff’s claims. Individual proof is not relevant here. Once again, Defendants misapprehend the nature of the case at hand. This is not an individual case, nor a series of individual cases; it is brought by public entities. Individual proof is neither relevant nor admissible. The burden imposed by identifying “each prescription,” each “dispensing pharmacy,” each “dispensing pharmacist” and each “dispensing date” is totally disproportional to the needs of the case.

Plaintiff objects to this request in that it calls for information in the National Retail Pharmacy Defendants’ possession or control. The requested information is more readily available to Defendants from their own business dealings or third-party sources than available to Plaintiff. Plaintiff further objects to this Interrogatory in that it places an undue burden on Plaintiff not proportional to the needs of the case considering (1) the lack of relevance or importance of the materials to the claims and defenses in this litigation, as described above, and (2) the substantial cost to identify and describe responsive materials and the right to privacy of the individuals not at issue in this case. Plaintiff also objects to the extent this Interrogatory calls for Confidential Information not in Plaintiff’s possession and protected by privacy laws. In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness

opinion(s) that will be disclosed in accordance with case management and pretrial orders and the Federal Rules of Civil Procedure.

Subject to and without waiving all objections, Plaintiff responds as follows: the ARCOS database identifies the following pharmacies within Summit County, Ohio²:

PHARMACY/BUYER NAME	CITY/STATE
Dr. A. J. GINGO	AKRON, OH
THE FRED W ALBRECHT GROCERY CO	STOW, OH
RITZMAN PHARMACY #107	AKRON, OH
SUMMIT PAIN SPECIALISTS PHARMACY	STOW, OH
RITZMAN PHARMACY #106	NORTON, OH
THE FRED W ALBRECHT GROCERY	AKRON, OH
SKILLED CARE PHARMACY-CLEV	TWINSBURG, OH
WALGREEN CO. #03572	CUYAHOGA FALLS, OH
RITZMAN PHARMACY #101	AKRON, OH
OHIO CVS STORES, L.L.C.	AKRON, OH
ACME PHARMACY #11	TALLMADGE, OH
WALGREEN CO.	AKRON, OH
MARC GLASSMAN INC	AKRON, OH
RITE AID OF OHIO, INC.	BARBERTON, OH
TARGET STORES A DIV. OF TARGET CORP.	AKRON, OH
KLEIN'S PHARMACY	CUYAHOGA FALLS, OH
GIANT EAGLE PHARMACY #4036	CUYAHOGA FALLS, OH
CHILDRENS HOSPITAL MED CTR	AKRON, OH
FRED W ALBRECHT GROCERY CO	AKRON, OH
CVS PHARMACY #04800	AKRON, OH
GLASSMAN INC	SAGAMORE HILLS, OH
RITE AID OF OHIO, INC.	AKRON, OH
RITE AID OF OHIO, INC.	TALLMADGE, OH
SUMMA HEALTH SYSTEM	AKRON, OH

² This does not account for the flood of opioids from surrounding counties and states; Plaintiff expressly reserves the right to amend, modify, or supplement on this point.

GIANT EAGLE PHARMACY #5878	CUYAHOGA FALLS, OH
THE FRED W ALBRECHT GROCERY	AKRON, OH
AKRON PHARMACY	AKRON, OH
GIANT EAGLE PHARMACY #6299	NORTHFIELD, OH
KLEIN'S COMMUNITY HEALTH	AKRON, OH
MARCS CHAPEL HILL INC	CUYAHOGA FALLS, OH
ACME PHARMACY #30	STOW, OH
TARGET STORES A DIV.OF TARGET CORP.	FAIRLAWN, OH
KMART PHARMACY #7383	BARBERTON, OH
THE FRED W ALBRECHT GROC CO	NORTON, OH
NEW CHOICE PHARMACY #2	CUYAHOGA FALLS, OH
RITZMAN PHARMACY #105	AKRON, OH
THE FRED W ALBRECHT GROCERY	HUDSON, OH
RITE AID OF OHIO, INC.	FAIRLAWN, OH
THE FRED W ALBRECHT GROCERY	STOW, OH
RITE AID OF OHIO, INC.	AKRON, OH
THE FRED W ALBRECHT GROCERY	CUYAHOGA FALLS, OH
GIANT EAGLE PHARMACY #4031	BARBERTON, OH
GIANT EAGLE PHARMACY #4030	TALLMADGE, OH
RITE AID OF OHIO, INC. #3151	AKRON, OH
COLONIAL PHARMACY	BATH, OH
MARC	AKRON, OH
NEW CHOICE PHARMACY #1	CUYAHOGA FALLS, OH
VA OUTPATIENT CLINIC	AKRON, OH
RITE AID OF OHIO, INC.	AKRON, OH
GIANT EAGLE PHARMACY #4124	AKRON, OH
GIANT EAGLE PHARMACY #4029	AKRON, OH

Further, Plaintiff identifies the following pharmacies as having the largest shipments of opioids:

PHARMACY NAME	ADDRESS
KLEIN'S PHARMACY	KLEIN BARRY E 2015 STATE RD CUYAHOGA FALLS, OH 44223
THE FRED W ALBRECHT GROCERY CO	4302 ALLEN RD SUITE #110 STOW, OH 44224
NEW CHOICE PHARMACY	1900 23RD STREET CUYAHOGA FALLS, OH 44223
RITE AID OF OHIO, INC.	325 EAST WATERLOO ROAD AKRON, OH 44319
RITZMAN PHARMACY #101	1323 COPLEY RD AKRON, OH 44320
OHIO CVS STORES, L.L.C.	590 EAST MARKET STREET AKRON, OH 44304
SUMMIT PAIN SPECIALISTS PHARMACY	4302 ALLEN RD SUITE 300 STOW, OH 44224
GIANT EAGLE PHARMACY #4031	41 5TH STREET SE BARBERTON, OH 44203
WALGREEN CO.	2645 STATE RD CUYAHOGA FALLS, OH 44223
WALGREEN CO.	302 CANTON ROAD AKRON, OH 44312
THE FRED W ALBRECHT GROCERY	DBA ACME PHARMACY #18 2147 EAST AVENUE AKRON, OH 44314
WALGREEN CO.	1130 S. ARLINGTON ST AKRON, OH 44306
OHIO CVS STORES, L.L.C.	3352 KENT ROAD STOW, OH 44224
WALGREEN CO.	900 WOOSTER RD NORTH BARBERTON, OH 44203
RITE AID OF OHIO, INC.	1540 CANTON ROAD AKRON, OH 44312
HIGHLAND SQUARE PHCY	786 W MARKET ST AKRON, OH 44303
OHIO CVS STORES, L.L.C.	1225 CANTON RD AKRON, OH 44312
WALGREEN CO.	1303 COPLEY ROAD AKRON, OH 44320
RITZMAN PHARMACY #107	157 WEST CEDAR STREET AKRON, OH 44307
NEW CHOICE PHARMACY	1900 23RD STREET CUYAHOGA FALLS, OH 44223

RITE AID OF OHIO, INC.	1047 KENMORE BOULEVARD AKRON, OH 44314
GIANT EAGLE PHARMACY #4124	484 EAST WATERLOO RD AKRON, OH 44319
WALGREEN CO.	830 BRITTAIN RD AKRON, OH 44305
OHIO CVS STORES, L.L.C.	235 EAST CUYAHOGA FALLS AVE AKRON, OH 44310
OHIO CVS STORES, L.L.C.	4195 S. CLEVELAND-MASSILLON ROAD NORTON, OH 44203
WALGREEN CO.	834 W. MARKET STREET AKRON, OH 44303
WALGREEN CO.	3009 W. MARKET ST. FAIRLAWN, OH 44333
RITZMAN PHARMACY #102	390 ROBINSON AVENUE, SUITE A BARBERTON, OH 44203
FRED W ALBRECHT GROCERY CO	DBA ACME PHARMACY #14 3235 MANCHESTER RD AKRON, OH 44319
OHIO CVS STORES, L.L.C.	2091 EASTWOOD AVENUE AKRON, OH 44305
OHIO CVS STORES, L.L.C.	780 BRITTAIN ROAD AKRON, OH 44305
OHIO CVS STORES, L.L.C.	1711 STATE RD CUYAHOGA FALLS, OH 44223
OHIO CVS STORES, L.L.C.	426 ROBINSON AVE. BARBERTON, OH 44203
RITE AID OF OHIO, INC.	2975 WEST MARKET STREET FAIRLAWN, OH 44333
OHIO CVS STORES, L.L.C.	1949 WEST MARKET STREET AKRON, OH 44313
RALEY DRUG STORE, INC	1760 GOODYEAR BLVD AKRON, OH 44305
WALGREEN CO.	1925 W. MARKET ST. AKRON, OH 44313
OHIO CVS STORES, L.L.C.	10380 NORTHFIELD ROAD NORTHFIELD, OH 44067
DISCOUNT DRUG MART #33	655 PORTAGE TRAIL CUYAHOGA FALLS, OH 44221
GIANT EAGLE PHARMACY #4029	2801 EAST WATERLOO ROAD AKRON, OH 44312
GIANT EAGLE PHARMACY #4030	205 WEST AVE TALLMADGE, OH 44278

WALGREEN CO.	9043 DARROW RD TWINSBURG, OH 44087
RITE AID OF OHIO, INC.	4053 SOUTH MAIN STREET AKRON, OH 44319
RITE AID OF OHIO, INC.	1403 WOOSTER ROAD WEST BARBERTON, OH 44203
COPE PHARMACY INC	941 WEST NIMISILA RD AKRON, OH 44319
WALGREEN CO.	2086 GRAHAM RD. STOW, OH 44224
THE FRED W ALBRECHT GROCERY	DBA ACME PHARMACY #2 2420 WEDGEWOOD DRIVE AKRON, OH 44312
RITE AID OF OHIO, INC.	45 EAST AVENUE TALLMADGE, OH 44278
THE FRED W ALBRECHT GROC CO	DBA: ACME PHARMACY 6 3200 GREENWICH ROAD NORTON, OH 44203
HEALTHSPAN INTEGRATED CARE	1260 INDEPENDENCE AVE AKRON, OH 44310

Plaintiff incorporates its answer and objections to Interrogatory No. 2 here. As noted, discovery is ongoing and information responsive to this Interrogatory will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure. Plaintiff reserves the right to supplement, amend, or modify this response as discovery proceeds.

Interrogatory 4

Identify each person in Your geographic area who during the Relevant Time Period forged or otherwise improperly altered any prescription for any Prescription Opioid or who sought to obtain any Prescription Opioid through a forged or otherwise improper prescription.

Response 4

Plaintiff objects to the vast over breadth asking for “each person” who “forged” or “improperly altered” “any prescription for any Opioid.” Plaintiff objects that this is not relevant

to the claims in this case. Plaintiff objects to this Interrogatory in that it calls for information in the National Retail Pharmacy Defendants' possession or control. The requested information is more readily available to Defendants from their own business dealings or third-party sources than available to Plaintiff. Plaintiff objects to this Interrogatory in that it places an undue burden on Plaintiff wholly disproportional to the needs of the case.

Subject to and without waiving all objections, Plaintiff responds that such local prescriber- and patient-level data would be in the possession of the data mining companies frequently used by Defendants to monitor such information. These companies include, but are not limited to, IMS Health, QuintilesIMS, IQVIA, Pharmaceutical Data Services, Source Healthcare Analytics, NDS Health Information Services, Verispan, Quintiles, SDI Health, ArcLight, Scriptline, Wolters Kluwer, and PRA Health Science. Pursuant to comments from the U.S. Department of Justice Drug Enforcement Administration ("DEA"), Defendants also compiled "know your customer" questionnaires and files that would contain such data and information.

Subject to and without waiving all objections, Plaintiff responds that the persons prosecuted in Summit County for misconduct related to opioids include but are not limited to:

Dr. Charles Chiedo Njoku
Dr. Adolph Harper, Jr.
Adria Harper
Patricia Laughman
Tequilla Berry
Dr. Brian Heim

Plaintiff also identifies the following documents containing information responsive to this Interrogatory pursuant to Federal Rule of Civil Procedure 33(d):

SUMMIT_001131876-879
SUMMIT_000076823-847
SUMMIT_000077148-178
SUMMIT_000077175-335
SUMMIT_000077336-369
SUMMIT_001010174

SUMMIT_000076823-847
SUMMIT_000077147
SUMMIT_000077148-174
SUMMIT_000077175-335
SUMMIT_000077336-369
SUMMIT_000341980
AKRON_000237864-867
AKRON_000368237
AKRON_000368246
AKRON_000368453-455
AKRON_000368684-685
AKRON_000368686-687
AKRON_000368693-698
AKRON_000368700
AKRON_000368705-706
AKRON_000368707
AKRON_000368897
AKRON_000369261
AKRON_000369262-263
AKRON_000369715
AKRON_000004078
AKRON_000907525

Plaintiff further responds that this Interrogatory is contention discovery more appropriately answered once discovery is complete. *See* Fed. R. Civ. P. 33(a)(2) In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure. Plaintiff reserves the right to supplement, amend, or modify this response as discovery proceeds.

Interrogatory 5

Identify every instance during the Relevant Time Period in which You requested information relating to Prescription Opioids from the Ohio Automated Rx Reporting System (OARRS), including the date of the request, the subject matter of the request, the information You requested, the information You obtained in response to the request, and any action You took based on that information.

Response 5

Plaintiff objects to this Interrogatory as overly broad, vague, ambiguous, and unduly burdensome in seeking “every instance” in which Plaintiff “requested information” “relevant to” OARRS, “including the date of the request,” “the subject matter,” “the information requested,” “the information obtained in response,” and “any action You took based on that instruction.” Plaintiff objects to this Interrogatory in that it places an undue burden on Plaintiff not proportional to the needs of the case.

Subject to and without waiving all objections, Plaintiff identifies the following documents containing information responsive to this Interrogatory pursuant to Federal Rule of Civil Procedure 33(d):

AKRON_000003686	AKRON_000243979	AKRON_000249124
AKRON_000003748	AKRON_000243983	AKRON_000249154
AKRON_000003774	AKRON_000243988	AKRON_000249206
AKRON_000003776	AKRON_000243992	AKRON_000249443
AKRON_000003778	AKRON_000243996	AKRON_000249494
AKRON_000003870	AKRON_000244000	AKRON_000249618
AKRON_000231352	AKRON_000244005	AKRON_000249825
AKRON_000232311	AKRON_000244041	AKRON_000249830
AKRON_000236638	AKRON_000244046	AKRON_000253686
AKRON_000236647	AKRON_000244050	AKRON_000253711
AKRON_000236872	AKRON_000244054	AKRON_000253722
AKRON_000241196	AKRON_000244364	AKRON_000253764
AKRON_000241915	AKRON_000246657	AKRON_000253969
AKRON_000242944	AKRON_000247368	AKRON_000254002
AKRON_000242990	AKRON_000247371	AKRON_000254035
AKRON_000242992	AKRON_000247744	AKRON_000254068
AKRON_000242995	AKRON_000247881	AKRON_000254101
AKRON_000242997	AKRON_000248069	AKRON_000254134
AKRON_000243000	AKRON_000248073	AKRON_000254167
AKRON_000243158	AKRON_000248078	AKRON_000254200
AKRON_000243914	AKRON_000248455	AKRON_000254233
AKRON_000243915	AKRON_000248673	AKRON_000254266
AKRON_000243944	AKRON_000248825	AKRON_000254299
AKRON_000243968	AKRON_000248828	AKRON_000254332
AKRON_000243970	AKRON_000248831	AKRON_000254643
AKRON_000243973	AKRON_000248852	AKRON_000254944
AKRON_000243976	AKRON_000249037	AKRON_000254978

AKRON_000255010	AKRON_000260743	AKRON_000356927
AKRON_000255042	AKRON_000260775	AKRON_000365049
AKRON_000255074	AKRON_000261355	AKRON_000365490
AKRON_000255106	AKRON_000261387	AKRON_000373793
AKRON_000256508	AKRON_000261419	AKRON_000374827
AKRON_000256814	AKRON_000261999	AKRON_000375070
AKRON_000257120	AKRON_000262579	AKRON_000375473
AKRON_000257426	AKRON_000262611	AKRON_000366709
AKRON_000257732	AKRON_000263191	AKRON_000366710
AKRON_000257764	AKRON_000263223	AKRON_000366946
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SUMMIT_000294872	SUMMIT_000296784	SUMMIT_000309575
SUMMIT_000294905	SUMMIT_000296793	SUMMIT_000309595
SUMMIT_000294907	SUMMIT_000298595	SUMMIT_000309622
SUMMIT_000294931	SUMMIT_000298855	SUMMIT_000309828
SUMMIT_000294951	SUMMIT_000299506	SUMMIT_000310051
SUMMIT_000295633	SUMMIT_000299509	SUMMIT_000310078
SUMMIT_000295648	SUMMIT_000300267	SUMMIT_000310519
SUMMIT_000295652	SUMMIT_000300284	SUMMIT_000310613
SUMMIT_000295668	SUMMIT_000300673	SUMMIT_000310618
SUMMIT_000295669	SUMMIT_000300750	SUMMIT_000310968
SUMMIT_000295678	SUMMIT_000300755	SUMMIT_000311347
SUMMIT_000295681	SUMMIT_000300762	SUMMIT_000311363
SUMMIT_000295683	SUMMIT_000300878	SUMMIT_000311366

SUMMIT_000311451	SUMMIT_000322174	SUMMIT_000330545
SUMMIT_000311464	SUMMIT_000322486	SUMMIT_000330553
SUMMIT_000311466	SUMMIT_000322514	SUMMIT_000330958
SUMMIT_000311468	SUMMIT_000322556	SUMMIT_000330961
SUMMIT_000311534	SUMMIT_000322558	SUMMIT_000331309
SUMMIT_000311543	SUMMIT_000323211	SUMMIT_000331310
SUMMIT_000312155	SUMMIT_000323990	SUMMIT_000331908
SUMMIT_000312942	SUMMIT_000324097	SUMMIT_000331916
SUMMIT_000314981	SUMMIT_000324456	SUMMIT_000333124
SUMMIT_000315000	SUMMIT_000325425	SUMMIT_000333409
SUMMIT_000315275	SUMMIT_000325427	SUMMIT_000333655
SUMMIT_000315278	SUMMIT_000325429	SUMMIT_000333682
SUMMIT_000315318	SUMMIT_000325430	SUMMIT_000334163
SUMMIT_000315320	SUMMIT_000326966	SUMMIT_000334251
SUMMIT_000315966	SUMMIT_000326968	SUMMIT_000334304
SUMMIT_000316069	SUMMIT_000326970	SUMMIT_000334392
SUMMIT_000316229	SUMMIT_000326973	SUMMIT_000334435
SUMMIT_000316371	SUMMIT_000326976	SUMMIT_000334462
SUMMIT_000316624	SUMMIT_000326984	SUMMIT_000334487
SUMMIT_000316627	SUMMIT_000326986	SUMMIT_000334517
SUMMIT_000316652	SUMMIT_000326989	SUMMIT_000334527
SUMMIT_000316972	SUMMIT_000326991	SUMMIT_000337186
SUMMIT_000316981	SUMMIT_000326993	SUMMIT_000337387
SUMMIT_000316988	SUMMIT_000326995	SUMMIT_000337426
SUMMIT_000317047	SUMMIT_000327005	SUMMIT_000337491
SUMMIT_000317088	SUMMIT_000327066	SUMMIT_000339978
SUMMIT_000317293	SUMMIT_000327070	SUMMIT_000339984
SUMMIT_000317303	SUMMIT_000327172	SUMMIT_000340007
SUMMIT_000318176	SUMMIT_000327189	SUMMIT_001008150
SUMMIT_000318179	SUMMIT_000327198	SUMMIT_001008205
SUMMIT_000318182	SUMMIT_000327211	SUMMIT_001009418
SUMMIT_000318300	SUMMIT_000327213	SUMMIT_001009721
SUMMIT_000318304	SUMMIT_000327215	SUMMIT_001010007
SUMMIT_000320227	SUMMIT_000327221	SUMMIT_001010085
SUMMIT_000320235	SUMMIT_000327225	SUMMIT_001010424
SUMMIT_000320839	SUMMIT_000327234	SUMMIT_001010493
SUMMIT_000320910	SUMMIT_000327253	SUMMIT_001010835
SUMMIT_000321024	SUMMIT_000328512	SUMMIT_001010879
SUMMIT_000321136	SUMMIT_000328579	SUMMIT_001016306
SUMMIT_000321324	SUMMIT_000328706	SUMMIT_001016472
SUMMIT_000321351	SUMMIT_000328772	SUMMIT_001016561
SUMMIT_000321644	SUMMIT_000328797	SUMMIT_001016619
SUMMIT_000321736	SUMMIT_000329307	SUMMIT_001017850
SUMMIT_000321750	SUMMIT_000329317	SUMMIT_001017866
SUMMIT_000321837	SUMMIT_000330208	SUMMIT_001017988
SUMMIT_000321908	SUMMIT_000330406	SUMMIT_001017989
SUMMIT_000322171	SUMMIT_000330412	SUMMIT_001018618

SUMMIT_001019292	SUMMIT_001029033	SUMMIT_001039784
SUMMIT_001019366	SUMMIT_001029615	SUMMIT_001039894
SUMMIT_001019582	SUMMIT_001029619	SUMMIT_001040490
SUMMIT_001020168	SUMMIT_001029743	SUMMIT_001040628
SUMMIT_001022329	SUMMIT_001029928	SUMMIT_001041248
SUMMIT_001022335	SUMMIT_001029945	SUMMIT_001042045
SUMMIT_001022336	SUMMIT_001030115	SUMMIT_001042594
SUMMIT_001022350	SUMMIT_001030118	SUMMIT_001042669
SUMMIT_001022360	SUMMIT_001030121	SUMMIT_001043038
SUMMIT_001022362	SUMMIT_001031412	SUMMIT_001043374
SUMMIT_001022371	SUMMIT_001031415	SUMMIT_001043375
SUMMIT_001022373	SUMMIT_001031463	SUMMIT_001043428
SUMMIT_001022376	SUMMIT_001031465	SUMMIT_001043440
SUMMIT_001022408	SUMMIT_001032005	SUMMIT_001043484
SUMMIT_001022445	SUMMIT_001032007	SUMMIT_001043594
SUMMIT_001022448	SUMMIT_001033424	SUMMIT_001043596
SUMMIT_001022526	SUMMIT_001033428	SUMMIT_001043606
SUMMIT_001022530	SUMMIT_001033446	SUMMIT_001043609
SUMMIT_001022539	SUMMIT_001033515	SUMMIT_001043801
SUMMIT_001022544	SUMMIT_001033743	SUMMIT_001043884
SUMMIT_001022906	SUMMIT_001034760	SUMMIT_001044161
SUMMIT_001022921	SUMMIT_001034871	SUMMIT_001045319
SUMMIT_001023129	SUMMIT_001034874	SUMMIT_001045328
SUMMIT_001023131	SUMMIT_001035179	SUMMIT_001045346
SUMMIT_001023132	SUMMIT_001035181	SUMMIT_001045431
SUMMIT_001023134	SUMMIT_001035589	SUMMIT_001046405
SUMMIT_001023147	SUMMIT_001035599	SUMMIT_001046420
SUMMIT_001023148	SUMMIT_001035608	SUMMIT_001047643
SUMMIT_001023199	SUMMIT_001035627	SUMMIT_001047665
SUMMIT_001024744	SUMMIT_001035638	SUMMIT_001048478
SUMMIT_001025020	SUMMIT_001035690	SUMMIT_001048651
SUMMIT_001025028	SUMMIT_001035710	SUMMIT_001049006
SUMMIT_001025265	SUMMIT_001035719	SUMMIT_001049047
SUMMIT_001025563	SUMMIT_001035731	SUMMIT_001049062
SUMMIT_001025574	SUMMIT_001035740	SUMMIT_001049126
SUMMIT_001025578	SUMMIT_001036913	SUMMIT_001049160
SUMMIT_001026148	SUMMIT_001037262	SUMMIT_001049387
SUMMIT_001026354	SUMMIT_001037265	SUMMIT_001049459
SUMMIT_001026549	SUMMIT_001037536	SUMMIT_001050028
SUMMIT_001027354	SUMMIT_001037538	SUMMIT_001050062
SUMMIT_001027490	SUMMIT_001037822	SUMMIT_001050592
SUMMIT_001027944	SUMMIT_001037844	SUMMIT_001050979
SUMMIT_001028170	SUMMIT_001037936	SUMMIT_001051252
SUMMIT_001028308	SUMMIT_001038199	SUMMIT_001051590
SUMMIT_001028395	SUMMIT_001038258	SUMMIT_001052036
SUMMIT_001028913	SUMMIT_001038261	SUMMIT_001052039
SUMMIT_001028916	SUMMIT_001038632	SUMMIT_001052047

SUMMIT_001052050	SUMMIT_001060379	SUMMIT_001078622
SUMMIT_001052068	SUMMIT_001060402	SUMMIT_001078966
SUMMIT_001052083	SUMMIT_001060467	SUMMIT_001079237
SUMMIT_001052475	SUMMIT_001061048	SUMMIT_001080038
SUMMIT_001052482	SUMMIT_001061669	SUMMIT_001080432
SUMMIT_001052593	SUMMIT_001061670	SUMMIT_001080489
SUMMIT_001052596	SUMMIT_001062100	SUMMIT_001080596
SUMMIT_001052926	SUMMIT_001062227	SUMMIT_001080949
SUMMIT_001052958	SUMMIT_001064889	SUMMIT_001081914
SUMMIT_001053063	SUMMIT_001064892	SUMMIT_001081916
SUMMIT_001053663	SUMMIT_001064956	SUMMIT_001081917
SUMMIT_001053838	SUMMIT_001065010	SUMMIT_001083977
SUMMIT_001053841	SUMMIT_001065035	SUMMIT_001085401
SUMMIT_001054087	SUMMIT_001066001	SUMMIT_001085409
SUMMIT_001054091	SUMMIT_001066004	SUMMIT_001085413
SUMMIT_001054097	SUMMIT_001066061	SUMMIT_001085689
SUMMIT_001054100	SUMMIT_001067128	SUMMIT_001086250
SUMMIT_001054332	SUMMIT_001067364	SUMMIT_001086922
SUMMIT_001054354	SUMMIT_001067803	SUMMIT_001088673
SUMMIT_001054358	SUMMIT_001067856	SUMMIT_001089975
SUMMIT_001054363	SUMMIT_001067977	SUMMIT_001089977
SUMMIT_001054367	SUMMIT_001067978	SUMMIT_001089993
SUMMIT_001054370	SUMMIT_001067981	SUMMIT_001090150
SUMMIT_001054373	SUMMIT_001067982	SUMMIT_001090885
SUMMIT_001054383	SUMMIT_001067983	SUMMIT_001090888
SUMMIT_001054386	SUMMIT_001067985	SUMMIT_001091118
SUMMIT_001054389	SUMMIT_001067987	SUMMIT_001091120
SUMMIT_001054392	SUMMIT_001067989	SUMMIT_001091124
SUMMIT_001054417	SUMMIT_001067991	SUMMIT_001091240
SUMMIT_001054426	SUMMIT_001067993	SUMMIT_001091325
SUMMIT_001054470	SUMMIT_001067994	SUMMIT_001091329
SUMMIT_001054477	SUMMIT_001068019	SUMMIT_001091331
SUMMIT_001054481	SUMMIT_001069415	SUMMIT_001091333
SUMMIT_001054509	SUMMIT_001069418	SUMMIT_001091414
SUMMIT_001054519	SUMMIT_001070089	SUMMIT_001091439
SUMMIT_001055492	SUMMIT_001070916	SUMMIT_001091873
SUMMIT_001057475	SUMMIT_001070951	SUMMIT_001092313
SUMMIT_001058383	SUMMIT_001070953	SUMMIT_001092489
SUMMIT_001058384	SUMMIT_001071072	SUMMIT_001092862
SUMMIT_001058721	SUMMIT_001071099	SUMMIT_001092866
SUMMIT_001058725	SUMMIT_001075657	SUMMIT_001093043
SUMMIT_001058945	SUMMIT_001075689	SUMMIT_001093047
SUMMIT_001059558	SUMMIT_001076858	SUMMIT_001093314
SUMMIT_001059562	SUMMIT_001077899	SUMMIT_001093320
SUMMIT_001059564	SUMMIT_001077972	SUMMIT_001094185
SUMMIT_001059566	SUMMIT_001077979	SUMMIT_001094511
SUMMIT_001059569	SUMMIT_001078109	SUMMIT_001094579

SUMMIT_001094584	SUMMIT_001103952	SUMMIT_001112250
SUMMIT_001094588	SUMMIT_001104973	SUMMIT_001112289
SUMMIT_001094594	SUMMIT_001104983	SUMMIT_001112329
SUMMIT_001094600	SUMMIT_001106011	SUMMIT_001112333
SUMMIT_001094770	SUMMIT_001106506	SUMMIT_001113094
SUMMIT_001094815	SUMMIT_001106512	SUMMIT_001113095
SUMMIT_001094974	SUMMIT_001107837	SUMMIT_001113409
SUMMIT_001095307	SUMMIT_001107980	SUMMIT_001113536
SUMMIT_001095324	SUMMIT_001107987	SUMMIT_001114454
SUMMIT_001095809	SUMMIT_001107995	SUMMIT_001114686
SUMMIT_001095812	SUMMIT_001108180	SUMMIT_001114726
SUMMIT_001095856	SUMMIT_001108184	SUMMIT_001114761
SUMMIT_001096161	SUMMIT_001108328	SUMMIT_001114821
SUMMIT_001096313	SUMMIT_001108331	SUMMIT_001114827
SUMMIT_001096341	SUMMIT_001108335	SUMMIT_001114833
SUMMIT_001096379	SUMMIT_001108508	SUMMIT_001114893
SUMMIT_001096505	SUMMIT_001108509	SUMMIT_001114900
SUMMIT_001096735	SUMMIT_001108525	SUMMIT_001114957
SUMMIT_001097351	SUMMIT_001108686	SUMMIT_001115047
SUMMIT_001097492	SUMMIT_001108937	SUMMIT_001115262
SUMMIT_001098398	SUMMIT_001109383	SUMMIT_001115931
SUMMIT_001098741	SUMMIT_001109467	SUMMIT_001115951
SUMMIT_001098812	SUMMIT_001109486	SUMMIT_001115954
SUMMIT_001098887	SUMMIT_001109521	SUMMIT_001115961
SUMMIT_001099066	SUMMIT_001109638	SUMMIT_001115992
SUMMIT_001099840	SUMMIT_001109918	SUMMIT_001116599
SUMMIT_001100346	SUMMIT_001110055	SUMMIT_001116602
SUMMIT_001100590	SUMMIT_001110443	SUMMIT_001116799
SUMMIT_001100834	SUMMIT_001110445	SUMMIT_001116819
SUMMIT_001101234	SUMMIT_001110446	SUMMIT_001117155
SUMMIT_001101237	SUMMIT_001110448	SUMMIT_001117643
SUMMIT_001101394	SUMMIT_001110449	SUMMIT_001118207
SUMMIT_001101439	SUMMIT_001110693	SUMMIT_001118208
SUMMIT_001101562	SUMMIT_001110701	SUMMIT_001118209
SUMMIT_001101591	SUMMIT_001110705	SUMMIT_001118217
SUMMIT_001101820	SUMMIT_001110721	SUMMIT_001119548
SUMMIT_001102322	SUMMIT_001110725	SUMMIT_001119549
SUMMIT_001102677	SUMMIT_001110760	SUMMIT_001119550
SUMMIT_001102887	SUMMIT_001111050	SUMMIT_001122280
SUMMIT_001103089	SUMMIT_001111087	SUMMIT_001122417
SUMMIT_001103092	SUMMIT_001111090	SUMMIT_001122698
SUMMIT_001103111	SUMMIT_001111182	SUMMIT_001122874
SUMMIT_001103307	SUMMIT_001111770	SUMMIT_001122889
SUMMIT_001103360	SUMMIT_001111777	SUMMIT_001122891
SUMMIT_001103367	SUMMIT_001112049	SUMMIT_001122895
SUMMIT_001103531	SUMMIT_001112051	SUMMIT_001123352
SUMMIT_001103785	SUMMIT_001112248	SUMMIT_001123353

SUMMIT_001123356	SUMMIT_000983453	SUMMIT_000341153
SUMMIT_001123725	SUMMIT_000983856	SUMMIT_000341159
SUMMIT_001123726	SUMMIT_000985457	SUMMIT_000341165
SUMMIT_001123761	SUMMIT_000985475	SUMMIT_000341176
SUMMIT_001123762	SUMMIT_000993534	SUMMIT_000341180
SUMMIT_001124364	SUMMIT_000999500	SUMMIT_000341182
SUMMIT_001124459	SUMMIT_001011218	SUMMIT_000341184
SUMMIT_001125232	SUMMIT_001011219	SUMMIT_000341209
SUMMIT_001125313	SUMMIT_001012689	SUMMIT_000341225
SUMMIT_001125338	SUMMIT_001014261	SUMMIT_000341228
SUMMIT_001125924	SUMMIT_001014289	SUMMIT_000341238
SUMMIT_001125943	SUMMIT_001014299	SUMMIT_000341244
SUMMIT_001125945	SUMMIT_001014300	SUMMIT_000341253
SUMMIT_001125954	SUMMIT_001014326	SUMMIT_000341264
SUMMIT_001126222	SUMMIT_001014328	SUMMIT_000341269
SUMMIT_001127810	SUMMIT_001014365	SUMMIT_000341355
AKRON_000320575	SUMMIT_001014383	SUMMIT_000341448
AKRON_000319989	SUMMIT_001014428	SUMMIT_000341489
AKRON_000319991	SUMMIT_001014458	SUMMIT_000341594
SUMMIT_000972172	SUMMIT_001014530	SUMMIT_000341647
SUMMIT_000972540	SUMMIT_001014544	SUMMIT_000341675
SUMMIT_000973553	SUMMIT_001014902	SUMMIT_000341720
SUMMIT_000973830	SUMMIT_001014915	SUMMIT_000341895
SUMMIT_000973890	SUMMIT_001015082	SUMMIT_000341993
SUMMIT_000975760	SUMMIT_001015095	SUMMIT_000342004
SUMMIT_000977576	SUMMIT_001015306	SUMMIT_000342016
SUMMIT_000977587	SUMMIT_001015307	SUMMIT_000342025
SUMMIT_000978390	SUMMIT_001015435	SUMMIT_000342039
SUMMIT_000978400	SUMMIT_000341050	SUMMIT_000342040
SUMMIT_000979171	SUMMIT_000341056	SUMMIT_000342119
SUMMIT_000979432	SUMMIT_000341092	SUMMIT_000342120
SUMMIT_000980298	SUMMIT_000341100	SUMMIT_000342126
SUMMIT_000980909	SUMMIT_000341108	SUMMIT_000342237
SUMMIT_000982135	SUMMIT_000341117	SUMMIT_001128137
SUMMIT_000982629	SUMMIT_000341123	SUMMIT_001128223
SUMMIT_000983305	SUMMIT_000341128	
SUMMIT_000983360	SUMMIT_000341133	

Plaintiff reserves the right to supplement, amend, or modify this response as discovery proceeds.

Interrogatory 6

Identify each person employed by or associated with You, or whom You compensated, who possessed an account with OARRS, otherwise had access to information on OARRS, during

the Relevant Time Period. This includes, but is not limited to, all OARRS Supervisors and OARRS Officers for each of Your agencies that had access to OARRS. For each such person, state when access was first obtained and, if applicable, discontinued.

Response 6

Plaintiff objects to this Interrogatory as to the vast over breadth of “each person employed by or associated with You,” or “whom You compensated,” “who possessed an account with OARRS,” “who otherwise had access to information on OARRS,” when obtained and when/if discontinued. Plaintiff objects to this Interrogatory in that it places an undue burden on Plaintiff not proportional to the needs of the case. Plaintiff further objects in that the requested information is in the possession of a third party or third parties.

Subject to and without waiving all objections, Plaintiff responds upon information and belief that individuals who have access to OARRS within Summit County and the City of Akron include, but are not limited to, Dr. Lisa Kohler, Dr. Doug Smith, Steve Perch, PhD, Todd Barr, Lori Stella-Baker, George Sterbenz, Robert Velten, Matt Paolino and Patrick Leonard. Plaintiff incorporates by reference its answer and objections to Interrogatory No. 5. Plaintiff reserves the right to supplement, amend, or modify this response as discovery proceeds.

Interrogatory 7

Identify all Suspicious Orders for Prescription Opioids shipped by any National Retail Pharmacy Defendant in Your geographic area during the Relevant Time Period, including for each the name and location of the pharmacy that placed the order, the distributor to whom it was placed, the respective dates that it was placed and shipped, the manufacturer, name and amount of the medication that was ordered and shipped, and the reason(s) why the order was suspicious.

Response 7

Plaintiff objects to the over breadth of this Interrogatory. Plaintiff objects that this Interrogatory is vague as to “Suspicious Orders.” Plaintiff further objects to this request in that it calls for information in the possession or control of the National Retail Pharmacy Defendants, the Distributor Defendants and the Manufacturer Defendants and more readily and efficiently available to Defendants from their own business records or third-party sources than available to Plaintiff, and thus places an undue burden on Plaintiff.

Subject to and without waiving all objections, Plaintiff responds that this Interrogatory is contention discovery more appropriately answered once discovery is complete. *See* Fed. R. Civ. P. 33(a)(2) In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure.

Subject to and without waiving all objections, Plaintiff further responds as follows: the Controlled Substances Act (“CSA”) requires manufacturers and distributors of Schedule II substances like opioids to: (a) limit sales within a quota set by the DEA for the overall production of Schedule II substances like opioids; (b) register to manufacture or distribute opioids; (c) maintain effective controls against diversion of the controlled substances that they manufacture or distribute; and (d) design and operate a system to identify suspicious orders of controlled substances, halt such unlawful sales, and report them to the DEA.

Defendants have several responsibilities under state and federal law with respect to control of the supply chain of opioids. The DEA provides a series of guidelines on Suspicious Orders Reporting (“SOR”), contained in the Chemical Handlers Manual, that “are intended to assist chemical manufacturers, distributors, wholesalers and retailers to be alert to suspicious orders involving listed chemicals,” which include opioids. “The guidelines are intended to apply to all

aspects of commercial chemical manufacturing and distribution.” Defendants must set up a system to prevent diversion, including excessive volume and other suspicious orders. This includes reviewing Defendants’ own data, relying on their observations of prescribers and pharmacies, and following up on reports or concerns of potential diversion. All suspicious orders must be reported by Defendants to relevant enforcement authorities. Further, distributors must also stop shipment of any order which is flagged as suspicious and only ship orders which were flagged as potentially suspicious if, after conducting due diligence, they can determine that the order is not likely to be diverted into illegal channels.

To ensure that even drugs produced within quota are not diverted, federal regulations issued under the CSA mandate that all registrants, manufacturers, and distributors alike, “design and operate a system to disclose to the registrant suspicious orders of controlled substances.” 21 C.F.R. § 1301.74(b). Registrants are not entitled to be passive (but profitable) observers, but rather “shall inform the Field Division Office of the Administration in his area of suspicious orders when discovered by the registrant.” *Id.* Suspicious orders include orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency. *Id.* Other red flags may include, for example, “[o]rdering the same controlled substance from multiple distributors.” *Id.*

These criteria are disjunctive and are not all inclusive. For example, if an order deviates substantially from a normal pattern, the size of the order does not matter and the order should be reported as suspicious. Likewise, a distributor or manufacturer need not wait for a normal pattern to develop over time before determining whether a particular order is suspicious. The size of an order alone, regardless of whether it deviates from a normal pattern, is enough to trigger the responsibility to report the order as suspicious. The determination of whether an order is suspicious depends not only on the ordering patterns of the particular customer but also on the

patterns of the entirety of the customer base and the patterns throughout the relevant segment of the industry. For this reason, identification of suspicious orders serves also to identify excessive volume of the controlled substance being shipped to a particular region.

Despite Defendants' obligations to monitor, report, and promote control of suspicious orders, the ARCOS database identifies these pharmacies within Summit County, Ohio³:

PHARMACY/BUYER NAME	CITY/STATE
Dr. A. J. GINGO	AKRON, OH
THE FRED W ALBRECHT GROCERY CO	STOW, OH
RITZMAN PHARMACY #107	AKRON, OH
SUMMIT PAIN SPECIALISTS PHARMACY	STOW, OH
RITZMAN PHARMACY #106	NORTON, OH
THE FRED W ALBRECHT GROCERY	AKRON, OH
SKILLED CARE PHARMACY-CLEV	TWINSBURG, OH
WALGREEN CO. #03572	CUYAHOGA FALLS, OH
RITZMAN PHARMACY #101	AKRON, OH
OHIO CVS STORES, L.L.C.	AKRON, OH
ACME PHARMACY #11	TALLMADGE, OH
WALGREEN CO.	AKRON, OH
MARC GLASSMAN INC	AKRON, OH
RITE AID OF OHIO, INC.	BARBERTON, OH
TARGET STORES A DIV. OF TARGET CORP.	AKRON, OH
KLEIN'S PHARMACY	CUYAHOGA FALLS, OH
GIANT EAGLE PHARMACY #4036	CUYAHOGA FALLS, OH
CHILDRENS HOSPITAL MED CTR	AKRON, OH
FRED W ALBRECHT GROCERY CO	AKRON, OH
CVS PHARMACY #04800	AKRON, OH
GLASSMAN INC	SAGAMORE HILLS, OH

³ This does not account for the flood of opioids from surrounding counties and states; Plaintiff expressly reserves its right to amend, modify, replace or supplement on this point and answer with expert reports.

RITE AID OF OHIO, INC.	AKRON, OH
RITE AID OF OHIO, INC.	TALLMADGE, OH
SUMMA HEALTH SYSTEM	AKRON, OH
GIANT EAGLE PHARMACY #5878	CUYAHOGA FALLS, OH
THE FRED W ALBRECHT GROCERY	AKRON, OH
AKRON PHARMACY	AKRON, OH
GIANT EAGLE PHARMACY #6299	NORTHFIELD, OH
KLEIN'S COMMUNITY HEALTH	AKRON, OH
MARCS CHAPEL HILL INC	CUYAHOGA FALLS, OH
ACME PHARMACY #30	STOW, OH
TARGET STORES A DIV.OF TARGET CORP.	FAIRLAWN, OH
KMART PHARMACY #7383	BARBERTON, OH
THE FRED W ALBRECHT GROC CO	NORTON, OH
NEW CHOICE PHARMACY #2	CUYAHOGA FALLS, OH
RITZMAN PHARMACY #105	AKRON, OH
THE FRED W ALBRECHT GROCERY	HUDSON, OH
RITE AID OF OHIO, INC.	FAIRLAWN, OH
THE FRED W ALBRECHT GROCERY	STOW, OH
RITE AID OF OHIO, INC.	AKRON, OH
THE FRED W ALBRECHT GROCERY	CUYAHOGA FALLS, OH
GIANT EAGLE PHARMACY #4031	BARBERTON, OH
GIANT EAGLE PHARMACY #4030	TALLMADGE, OH
RITE AID OF OHIO, INC. #3151	AKRON, OH
COLONIAL PHARMACY	BATH, OH
MARC	AKRON, OH
NEW CHOICE PHARMACY #1	CUYAHOGA FALLS, OH
VA OUTPATIENT CLINIC	AKRON, OH
RITE AID OF OHIO, INC.	AKRON, OH
GIANT EAGLE PHARMACY #4124	AKRON, OH
GIANT EAGLE PHARMACY #4029	AKRON, OH

Further, Plaintiff identifies the following pharmacies as having the largest shipments of opioids:

PHARMACY NAME	ADDRESS
KLEIN'S PHARMACY	KLEIN BARRY E 2015 STATE RD CUYAHOGA FALLS, OH 44223
THE FRED W ALBRECHT GROCERY CO	4302 ALLEN RD SUITE #110 STOW, OH 44224
NEW CHOICE PHARMACY	1900 23RD STREET CUYAHOGA FALLS, OH 44223
RITE AID OF OHIO, INC.	325 EAST WATERLOO ROAD AKRON, OH 44319
RITZMAN PHARMACY #101	1323 COPLEY RD AKRON, OH 44320
OHIO CVS STORES, L.L.C.	590 EAST MARKET STREET AKRON, OH 44304
SUMMIT PAIN SPECIALISTS PHARMACY	4302 ALLEN RD SUITE 300 STOW, OH 44224
GIANT EAGLE PHARMACY #4031	41 5TH STREET SE BARBERTON, OH 44203
WALGREEN CO.	2645 STATE RD CUYAHOGA FALLS, OH 44223
WALGREEN CO.	302 CANTON ROAD AKRON, OH 44312
THE FRED W ALBRECHT GROCERY	DBA ACME PHARMACY #18 2147 EAST AVENUE AKRON, OH 44314
WALGREEN CO.	1130 S. ARLINGTON ST AKRON, OH 44306
OHIO CVS STORES, L.L.C.	3352 KENT ROAD STOW, OH 44224
WALGREEN CO.	900 WOOSTER RD NORTH BARBERTON, OH 44203
RITE AID OF OHIO, INC.	1540 CANTON ROAD AKRON, OH 44312
HIGHLAND SQUARE PHCY	786 W MARKET ST AKRON, OH 44303
OHIO CVS STORES, L.L.C.	1225 CANTON RD AKRON, OH 44312
WALGREEN CO.	1303 COPLEY ROAD AKRON, OH 44320

RITZMAN PHARMACY #107	157 WEST CEDAR STREET AKRON, OH 44307
NEW CHOICE PHARMACY	1900 23RD STREET CUYAHOGA FALLS, OH 44223
RITE AID OF OHIO, INC.	1047 KENMORE BOULEVARD AKRON, OH 44314
GIANT EAGLE PHARMACY #4124	484 EAST WATERLOO RD AKRON, OH 44319
WALGREEN CO.	830 BRITTAIN RD AKRON, OH 44305
OHIO CVS STORES, L.L.C.	235 EAST CUYAHOGA FALLS AVE AKRON, OH 44310
OHIO CVS STORES, L.L.C.	4195 S. CLEVELAND-MASSILLON ROAD NORTON, OH 44203
WALGREEN CO.	834 W. MARKET STREET AKRON, OH 44303
WALGREEN CO.	3009 W. MARKET ST. FAIRLAWN, OH 44333
RITZMAN PHARMACY #102	390 ROBINSON AVENUE, SUITE A BARBERTON, OH 44203
FRED W ALBRECHT GROCERY CO	DBA ACME PHARMACY #14 3235 MANCHESTER RD AKRON, OH 44319
OHIO CVS STORES, L.L.C.	2091 EASTWOOD AVENUE AKRON, OH 44305
OHIO CVS STORES, L.L.C.	780 BRITTAIN ROAD AKRON, OH 44305
OHIO CVS STORES, L.L.C.	1711 STATE RD CUYAHOGA FALLS, OH 44223
OHIO CVS STORES, L.L.C.	426 ROBINSON AVE. BARBERTON, OH 44203
RITE AID OF OHIO, INC.	2975 WEST MARKET STREET FAIRLAWN, OH 44333
OHIO CVS STORES, L.L.C.	1949 WEST MARKET STREET AKRON, OH 44313
RALEY DRUG STORE, INC	1760 GOODYEAR BLVD AKRON, OH 44305
WALGREEN CO.	1925 W. MARKET ST. AKRON, OH 44313
OHIO CVS STORES, L.L.C.	10380 NORTHFIELD ROAD NORTHFIELD, OH 44067
DISCOUNT DRUG MART #33	655 PORTAGE TRAIL CUYAHOGA FALLS, OH 44221

GIANT EAGLE PHARMACY #4029	2801 EAST WATERLOO ROAD AKRON, OH 44312
GIANT EAGLE PHARMACY #4030	205 WEST AVE TALLMADGE, OH 44278
WALGREEN CO.	9043 DARROW RD TWINSBURG, OH 44087
RITE AID OF OHIO, INC.	4053 SOUTH MAIN STREET AKRON, OH 44319
RITE AID OF OHIO, INC.	1403 WOOSTER ROAD WEST BARBERTON, OH 44203
COPE PHARMACY INC	941 WEST NIMISILA RD AKRON, OH 44319
WALGREEN CO.	2086 GRAHAM RD. STOW, OH 44224
THE FRED W ALBRECHT GROCERY	DBA ACME PHARMACY #2 2420 WEDGEWOOD DRIVE AKRON, OH 44312
RITE AID OF OHIO, INC.	45 EAST AVENUE TALLMADGE, OH 44278
THE FRED W ALBRECHT GROC CO	DBA: ACME PHARMACY 6 3200 GREENWICH ROAD NORTON, OH 44203
HEALTHSPAN INTEGRATED CARE	1260 INDEPENDENCE AVE AKRON, OH 44310

Subject to and without waiving all objections, Plaintiff identifies the following documents that may contain information responsive to this Interrogatory pursuant to Federal Rule of Civil Procedure 33(d):

SUMMIT_000030960	PLTF_2804_000000789	SUMMIT_000230473
SUMMIT_000030965	SUMMIT_000043110	SUMMIT_000243935
SUMMIT_000017088	SUMMIT_000082706	SUMMIT_000265802
SUMMIT_000017089	SUMMIT_000083246	SUMMIT_000289577
SUMMIT_000017090	SUMMIT_000083959	SUMMIT_000289799
SUMMIT_000017107	SUMMIT_000083975	SUMMIT_000311454
SUMMIT_000017130	SUMMIT_000085139	SUMMIT_000327201
SUMMIT_000017131	SUMMIT_000085344	SUMMIT_000328822
PLTF_2804_000001983	SUMMIT_000105180	SUMMIT_000330261
PLTF_2804_000002477	SUMMIT_000105464	AKRON_000206791
PLTF_2804_000002688	SUMMIT_000105908	SUMMIT_000820659
PLTF_2804_000000689	SUMMIT_000127035	SUMMIT_000820664
PLTF_2804_000000732	SUMMIT_000127649	SUMMIT_000820693
PLTF_2804_000000775	SUMMIT_000148446	SUMMIT_000820936

SUMMIT_000822287	SUMMIT_000929881	SUMMIT_001192679
SUMMIT_000822377	SUMMIT_000930965	SUMMIT_001212421
SUMMIT_000823054	SUMMIT_000930970	SUMMIT_001218406
SUMMIT_000823598	SUMMIT_000931870	SUMMIT_001219346
SUMMIT_000823619	SUMMIT_000932352	SUMMIT_001219657
SUMMIT_000824191	SUMMIT_000932492	SUMMIT_001228020
SUMMIT_000824376	SUMMIT_000936411	AKRON_000323962
SUMMIT_000824386	SUMMIT_000937747	SUMMIT_001260146
SUMMIT_000824482	SUMMIT_000937749	SUMMIT_001266117
SUMMIT_000824517	SUMMIT_000937751	SUMMIT_001283213
SUMMIT_000824550	SUMMIT_000937768	SUMMIT_001284658
SUMMIT_000824553	SUMMIT_000937923	SUMMIT_001285496
SUMMIT_000824669	SUMMIT_000938139	SUMMIT_001289922
SUMMIT_000824670	SUMMIT_000938141	SUMMIT_001343340
SUMMIT_000825363	SUMMIT_000938147	SUMMIT_001343578
SUMMIT_000825365	SUMMIT_000945127	SUMMIT_001346116
SUMMIT_000826292	AKRON_000271486	SUMMIT_001354423
SUMMIT_000826389	AKRON_000244968	SUMMIT_001354694
SUMMIT_000826390	SUMMIT_001001784	SUMMIT_001355035
SUMMIT_000826728	SUMMIT_001021669	SUMMIT_001355749
SUMMIT_000827156	SUMMIT_001052962	SUMMIT_001361120
SUMMIT_000827476	SUMMIT_001106127	SUMMIT_001361122
SUMMIT_000827719	SUMMIT_001109516	SUMMIT_001409620
SUMMIT_000827736	SUMMIT_001109521	SUMMIT_001410732
SUMMIT_000837505	SUMMIT_001116786	SUMMIT_001414985
SUMMIT_000838107	SUMMIT_001118217	AKRON_000361950
SUMMIT_000838945	AKRON_000319739	SUMMIT_000356152
SUMMIT_000841324	SUMMIT_001160929	AKRON_000368517
SUMMIT_000841462	SUMMIT_001161138	AKRON_000368534
SUMMIT_000842195	SUMMIT_001161168	AKRON_000369130
SUMMIT_000842236	SUMMIT_001190918	AKRON_000369165
SUMMIT_000843927	SUMMIT_001191264	AKRON_000369340
SUMMIT_000844121	SUMMIT_001191320	AKRON_000369860
SUMMIT_000854171	SUMMIT_001191352	AKRON_000370214
SUMMIT_000880281	SUMMIT_001191415	AKRON_000370388
SUMMIT_000919544	SUMMIT_001191436	SUMMIT_001451127
SUMMIT_000923037	SUMMIT_001192033	SUMMIT_001460442
SUMMIT_000929754	SUMMIT_001192341	
SUMMIT_000929799	SUMMIT_001192418	

As noted, discovery is ongoing and information responsive to this Interrogatory will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure. Plaintiff reserves the right to supplement, amend, or modify this response as discovery proceeds.

Interrogatory 8

Identify the “national comparative benchmarks and indefensible outliers” related to the Track One cases referred to in Paul Farrell’s June 13, 2018 email to Mark Lynch.

Response 8

Plaintiff objects to this Interrogatory as vague and ambiguous in seeking a definition of what legal counsel meant. Plaintiff further objects on the basis of relevance and its attempt to place a burden of response on Plaintiff not proportional to the needs of the case. Plaintiff also objects to this Interrogatory in that it calls for speculation into counsel’s thoughts, mental impressions, and/or work product. Plaintiff objects in that the information requested is not in its possession, custody, or control.

Subject to and without waving all objections, Plaintiff responds that it does not have Mr. Farrell’s email, which speaks for itself.

Interrogatory 9

Identify all physicians and any other health care providers who prescribed Prescription Opioids during the Relevant Time Period and who, at the time, were employed by You or practiced at facilities owned, operated, supported, or affiliated with You, including any public health care systems or facilities. For each individual, identify her or his place(s) of work and title(s) during the Relevant Time Period.

Response 9

Plaintiff objects to this Interrogatory as overly broad and unduly burdensome in seeking identifies of “all physicians and any other health care providers who prescribed Prescription Opioids” who were “employed by” or “practicing at facilities owned, operated, supported or affiliated” with Summit County or the City of Akron, “including any public health care system or facilities” along with “his or her place of work.” Specifically, this Interrogatory is overbroad as

to “affiliated” or “supported” as vague and ambiguous terms subject to varying interpretation. Plaintiff objects to this request in that it calls for information in the National Retail Pharmacy Defendants’ possession, custody, or control. The requested information is more readily available to Defendants from their own business dealings or third-party sources.

Subject to and without waving all objections, Plaintiff responds that they are public entities and not in the business of owning or operating health care systems or prescribing drugs. Plaintiff reserves the right to supplement, amend, or modify this response as discovery proceeds.

Interrogatory 10

Identify all pharmacies that, during the Relevant Time Period, were owned, operated, supported, or affiliated with You, including through any public health care systems or facilities, and all pharmacists and pharmacy technicians who were employed by, compensated by, or otherwise worked in those pharmacies during the Relevant Time Period. For each individual, identify her or his place(s) of work and title(s) during the Relevant Time Period.

Response 10

Plaintiff objects to this Interrogatory as vague, ambiguous, overly broad, and unduly burdensome. Plaintiff objects to this Interrogatory as to the use of the phrase “all pharmacies and pharmacy technicians who were employed by, compensated by, or otherwise worked in those pharmacies,” including their title(s) and place(s) of work. Plaintiff objects to this request in that it calls for information in the National Retail Pharmacy Defendants’ own possession or control. The requested information is more readily available to Defendants from their own business dealings or third-party sources than to the City of Akron or County of Summit.

Subject to and without waving all objections, Plaintiff responds they are not in the pharmacy business; they are public entities. In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed

in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure. Plaintiff incorporates its answer and objections to Interrogatory No. 9 here.

Interrogatory 11

Identify each instance in which a person identified in response to Interrogatory Nos. 9 and 10 was involved in the diversion of Prescription Opioids during the Relevant Time Period—including without limitation the improper prescribing or filling of Prescription Opioids or the submission to a distributor of a Suspicious Order. For each instance, identify the person, the nature of her or his involvement in the diversion, and the date of the diversion.

Response 11

Plaintiff objects to this Interrogatory as vague and ambiguous to the extent the term “involved in” is undefined and for the reasons and objections stated in Interrogatories Nos. 9 and 10, incorporated herein by reference. Plaintiff’s investigation of its damages caused by the Defendants is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure. Plaintiff reserves the right to supplement, amend, or modify this response as discovery proceeds.

Interrogatory 12

Identify all communications during the Relevant Time Period between any of the individuals identified in response to Interrogatory Nos 9 and 10 and any National Retail Pharmacy Defendant, or anyone who You maintain was acting on behalf of or in concert with any National Retail Pharmacy Defendant, including the date of the communication, the substance of the communication, and the parties to the communication.

Response 12

Plaintiff objects to this Interrogatory as overly broad and unduly burdensome. Plaintiff also objects to this Interrogatory as vague and ambiguous as to the phrase “acting on behalf or in concert with” as subject to differing interpretations. Plaintiff further objects to this request in that it calls for information uniquely in the National Retail Pharmacy Defendants’ possession or control. Plaintiff also objects to this request in that it calls for information uniquely in the Distributor Defendants’ possession or control. The requested information is therefore more readily available to Defendants, from their own business dealings or from third-party sources.

Subject to and without waiving all objections, Plaintiff responds that this Interrogatory is contention discovery more appropriately answered once discovery is complete. *See* Fed. R. Civ. P. 33(a)(2) In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure.

Subject to and without waiving all objections, Plaintiff responds that discovery is ongoing and Plaintiff is producing or has produced responsive documents if any such files exist. Plaintiff reserves the right to supplement, modify, or amend this response as discovery proceeds.

Interrogatory 13

Identify any fees, reimbursements, honoraria, gifts or other items of value received in the Relevant Time Period by any individual identified in response to Interrogatory Nos 9 and 10 from any Defendant named in Your Second Amended Complaint or from anyone who You maintain was acting on behalf of or in concert with any Defendant named in Your Second Amended Complaint.

Response 13

Plaintiff objects to this Interrogatory as overly broad in seeking “any fees, reimbursements, honoraria, gifts or other items of value received.” Plaintiff also objects to this Interrogatory as unduly burdensome and overly broad in that it calls for Plaintiff to identify the specific conduct of each Defendant. Plaintiffs further objects to this request in that it calls for information in the National Retail Pharmacy Defendants’ possession or control, and the requested information is therefore more readily available to Defendants from their own business dealings or third-party sources.

Subject to and without waiving any objections, Plaintiff responds that this Interrogatory is contention discovery more appropriately answered once discovery is complete. *See* Fed. R. Civ. P. 33(a)(2). In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure. As discovery continues, Plaintiff will produce a trial witness list and expert reports pursuant to the scheduling orders in this case. Plaintiff reserves the right to supplement, modify, or amend this response as discovery proceeds.

Interrogatory 14

Identify the individuals referenced anonymously in Your Second Amended Complaint as sources of information, including the name, address, and profession of each source.

Response 14

Plaintiff objects to the term “individuals referenced anonymously” and “sources of information” as vague and ambiguous and subject to varying interpretations. Plaintiff further objects to the extent it cannot determine which portions of the Second Amended Complaint are

being referred. Plaintiff also objects to the extent this Interrogatory is seeking attorney-client or work product privileged information.

Subject to and without waving all objections, Plaintiff refers Defendants to paragraph 658 of the Second Amended Complaint: “On information and belief, because of (among other sources of information) regulatory and other actions taken against the National Retail Pharmacies directly, actions taken against others pertaining to prescription opioids obtained from their retail stores, complaints and information from employees and other agents, and the massive volume of opioid prescription drug sale data that they developed and monitored, the National Retail Pharmacies were well aware that their distribution and dispensing activities fell far short of legal requirements.” (See “Corrected Second Amended Complaint and Jury Demand” filed on May 25, 2018 in the U.S. District Court for the Northern District of Ohio, Eastern Division). In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure.

Subject to and without waiving all objections, Plaintiff identifies Joseph T. Rannazzisis, Deputy Assistant Administrator, Office of Diversion Control, Drug Enforcement Agency, U.S. Department of Justice. Plaintiff reserves the right to supplement, modify, or amend this response as discovery proceeds.

Interrogatory 15

Identify each instance during the Relevant Time Period in which You or anyone acting on Your behalf, including but not limited to Your health care and law enforcement agencies, communicated with any pharmacy in Your geographic area about Prescription Opioids. This includes without limitation each instance You or anyone acting on Your behalf notified any pharmacy in Your geographic area that You suspected or believed Prescription Opioids were being

diverted from it. For each such communication, identify the pharmacy with which You had the communication, the substance of the communication, the date of the communication, and the persons who were party to it.

Response 15

Plaintiff objects to this Interrogatory as vague, ambiguous, overly broad, and unduly burdensome as to “identify each instance,” “including but not limited to,” “health care and law enforcement agencies,” “anyone,” “communicated with any pharmacy” regarding prescription opioids. Plaintiff further objects to this Interrogatory as to the vast over breadth of “including but not limited to,” “communicated with any pharmacy,” and “without limitation.” Plaintiff also objects to this Interrogatory as overly broad and burdensome as propounded, and in that it calls for Plaintiff to identify the specific conduct of each Defendant. Such a request creates a burden beyond what is appropriate and proportional to the needs of the case.

Subject to and without waiving all objections, Plaintiff responds that it believes responsive materials, if they exist, are included in the documents Plaintiff has already produced, or will produce, in this litigation. Plaintiff further responds that this Interrogatory is contention discovery more appropriately answered once discovery is complete. *See* Fed. R. Civ. P. 33(a)(2). In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure. As discovery continues, Plaintiff will produce a trial witness list and expert reports pursuant to the scheduling orders in this case. Plaintiff reserves the right to supplement, modify, or amend this response as discovery proceeds.

Interrogatory 16

Identify each instance during the Relevant Time Period in which You or anyone acting on Your behalf, including but not limited to Your health care and the law enforcement agencies,

communicated with any distributor of Prescription Opioids about Prescription Opioids. This includes without limitation each instance You or anyone acting on Your behalf notified any such distributor that You suspected or believed that Prescription Opioids shipped by the distributor were being diverted in Your geographic area. For each such communication, identify the distributor with which You had the communication, the substance of the communication, the date of the communication, and the persons who were party to it.

Response 16

Plaintiff objects to this Interrogatory as vague and ambiguous as to “health care and law enforcement agencies.” Plaintiff further objects to this Interrogatory as overbroad by asking Plaintiff to identify “each instance” anyone notified the distributor, “communicated with any distributor,” “including but not limited to,” and “without limitation.” Plaintiff objects to this Interrogatory as overly broad as propounded, and in that it calls for Plaintiff to identify the specific conduct of each Defendant. Plaintiff further objects to this request in that it calls for information in the possession or control of Defendants. The requested information is therefore more readily available to Defendants from their own business dealings or third-party sources than available to Plaintiff; and demanding Plaintiff somehow divines this defies the requirements of Fed. R. Civ. P. 26. Plaintiff objects that the language “the persons who were party to” each communication is overly broad.

Subject to and without waiving all objections, Plaintiff responds that it believes responsive materials, if they exist, are included in the documents Plaintiff has already produced, or will produce, in this litigation. *See* Federal Rule of Civil Procedure 33(d). Plaintiff responds that this Interrogatory is contention discovery more appropriately answered once discovery is complete. *See* Fed. R. Civ. P. 33(a)(2). In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in

accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure. Plaintiff reserves the right to supplement, modify, or amend this response as discovery proceeds.

Interrogatory 17

Identify all persons (other than Your attorneys in this action) from whom You have obtained information about alleged diversion in Your geographic area by a National Retail Pharmacy Defendant during the Relevant Time Period. Describe the information that each person possesses and identify the National Retail Pharmacy Defendant to which it pertains.

Response 17

Plaintiff objects to this Interrogatory as overly broad, vague, and ambiguous as to the term “obtained information.” Plaintiff further objects to this Interrogatory as overly broad as propounded, and in that it calls for Plaintiff to identify the specific conduct of each Defendant (“identify the National Retail Pharmacy Defendant to which it pertains”). Plaintiff objects to the extent this Interrogatory seeks attorney-client or work product privileged information. Plaintiff also objects to the extent that the information requested is not in its possession, custody, or control.

Subject to and without waiving all objections, Plaintiff responds that it has received ARCOS information from the DEA, and that responsive documents, if they exist, are included in the documents Plaintiff has already produced, or will produce, in this litigation. Plaintiff responds that this Interrogatory is contention discovery more appropriately answered once discovery is complete. *See* Fed. R. Civ. P. 33(a)(2). In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure.

Subject to and without waiving all objections, Plaintiff identifies Joseph T. Rannazzisis, Deputy Assistant Administrator, Office of Diversion Control, Drug Enforcement Agency, U.S.

Department of Justice. Plaintiff also identifies the following documents containing information responsive to this Interrogatory pursuant to Federal Rule of Civil Procedure 33(d):

SUMMIT_000017088	SUMMIT_000824482	SUMMIT_000938139
SUMMIT_000017089	SUMMIT_000824517	SUMMIT_000938141
SUMMIT_000017090	SUMMIT_000824550	SUMMIT_000938147
SUMMIT_000017107	SUMMIT_000824553	SUMMIT_000945127
SUMMIT_000017130	SUMMIT_000824669	SUMMIT_001001784
SUMMIT_000017131	SUMMIT_000824670	SUMMIT_001021669
SUMMIT_000030960	SUMMIT_000825363	SUMMIT_001052962
SUMMIT_000030965	SUMMIT_000825365	SUMMIT_001106127
SUMMIT_000043110	SUMMIT_000826292	SUMMIT_001109516
SUMMIT_000082706	SUMMIT_000826389	SUMMIT_001109521
SUMMIT_000083246	SUMMIT_000826390	SUMMIT_001116786
SUMMIT_000083959	SUMMIT_000826728	SUMMIT_001118217
SUMMIT_000083975	SUMMIT_000827156	SUMMIT_001160929
SUMMIT_000085139	SUMMIT_000827476	SUMMIT_001161138
SUMMIT_000085344	SUMMIT_000827719	SUMMIT_001161168
SUMMIT_000105180	SUMMIT_000827736	SUMMIT_001190918
SUMMIT_000105464	SUMMIT_000837505	SUMMIT_001191264
SUMMIT_000105908	SUMMIT_000838107	SUMMIT_001191320
SUMMIT_000127035	SUMMIT_000838945	SUMMIT_001191352
SUMMIT_000127649	SUMMIT_000841324	SUMMIT_001191415
SUMMIT_000148446	SUMMIT_000841462	SUMMIT_001191436
SUMMIT_000230473	SUMMIT_000842195	SUMMIT_001192033
SUMMIT_000243935	SUMMIT_000842236	SUMMIT_001192341
SUMMIT_000265802	SUMMIT_000843927	SUMMIT_001192418
SUMMIT_000289577	SUMMIT_000844121	SUMMIT_001192679
SUMMIT_000289799	SUMMIT_000854171	SUMMIT_001212421
SUMMIT_000311454	SUMMIT_000880281	SUMMIT_001218406
SUMMIT_000327201	SUMMIT_000919544	SUMMIT_001219346
SUMMIT_000328822	SUMMIT_000923037	SUMMIT_001219657
SUMMIT_000330261	SUMMIT_000929754	SUMMIT_001228020
SUMMIT_000356152	SUMMIT_000929799	SUMMIT_001260146
SUMMIT_000820659	SUMMIT_000929881	SUMMIT_001266117
SUMMIT_000820664	SUMMIT_000930965	SUMMIT_001283213
SUMMIT_000820693	SUMMIT_000930970	SUMMIT_001284658
SUMMIT_000820936	SUMMIT_000931870	SUMMIT_001285496
SUMMIT_000822287	SUMMIT_000932352	SUMMIT_001289922
SUMMIT_000822377	SUMMIT_000932492	SUMMIT_001343340
SUMMIT_000823054	SUMMIT_000936411	SUMMIT_001343578
SUMMIT_000823598	SUMMIT_000937747	SUMMIT_001346116
SUMMIT_000823619	SUMMIT_000937749	SUMMIT_001354423
SUMMIT_000824191	SUMMIT_000937751	SUMMIT_001354694
SUMMIT_000824376	SUMMIT_000937768	SUMMIT_001355035
SUMMIT_000824386	SUMMIT_000937923	SUMMIT_001355749

SUMMIT_001361120	AKRON_000206791	AKRON_000368534
SUMMIT_001361122	AKRON_000244968	AKRON_000369130
SUMMIT_001409620	AKRON_000271486	AKRON_000369165
SUMMIT_001410732	AKRON_000319739	AKRON_000369340
SUMMIT_001414985	AKRON_000323962	AKRON_000369860
SUMMIT_001451127	AKRON_000361950	AKRON_000370214
SUMMIT_001460442	AKRON_000368517	AKRON_000370388

Plaintiff reserves the right to supplement, modify, or amend this response as discovery proceeds.

Interrogatory 18

Identify each employee, contractor or other person to whom You provided compensation during the Relevant Time Period (other than Your attorneys in this action) who worked on addressing, or who provided information to You about, the problems You experienced or expenses You incurred from the diversion of Prescription Opioids.

Response 18

Plaintiff objects to the vast over breadth of this Interrogatory. Plaintiff further objects to this Interrogatory as overly broad, vague, and ambiguous as to “each employee, contractor or other person,” who “provided compensation,” or “worked on addressing,” “the problems.” These terms are subject to such widely varying interpretations that they make this Interrogatory so broad it is largely incomprehensible as drafted. Plaintiff objects to this request in that it calls for information in the public record and or in the National Retail Pharmacy Defendants’ possession, custody, or control. The requested information is therefore as easily available to Defendants from their own business dealings or third-party sources on the impact of their business.

Subject to and without waving all objections, Plaintiff responds that organizational charts have been produced by Plaintiff in this litigation and persons with knowledge have been identified. Plaintiff identifies the following individuals responsive to this Interrogatory: Lori Stella-Baker, Patrick Leonard and certain members of the Opiate Task Force.

Plaintiff identifies the following documents containing information responsive to this

Interrogatory pursuant to Federal Rule of Civil Procedure 33(d):

SUMMIT_000000207	SUMMIT_000026692	SUMMIT_000019580
SUMMIT_000001329	SUMMIT_000027075	SUMMIT_000019668
SUMMIT_000001461	SUMMIT_000031180	SUMMIT_000013416
SUMMIT_000001728	AKRON_000003688	SUMMIT_000014151
SUMMIT_000002310	SUMMIT_000023268	SUMMIT_000014772
SUMMIT_000002922	SUMMIT_000023439	SUMMIT_000015385
AKRON_000000003	SUMMIT_000023910	SUMMIT_000015990
AKRON_000000576	SUMMIT_000023927	SCGHD_000000900
AKRON_000001104	SUMMIT_000023928	SCGHD_000001063
AKRON_000001620	SUMMIT_000024153	SCGHD_000001068
AKRON_000002119	SUMMIT_000024194	SCGHD_000001077
AKRON_000002874	SUMMIT_000024200	PLTF_2804_000001472
AKRON_000003228	SUMMIT_000024207	PLTF_2804_000001707
AKRON_000003559	SUMMIT_000024208	PLTF_2804_000002019
SUMMIT_000003958	SUMMIT_000024214	PLTF_2804_000002594
SUMMIT_000004014	SUMMIT_000024523	PLTF_2804_000002688
SUMMIT_000004070	SUMMIT_000024580	PLTF_2804_000000093
SUMMIT_000004182	SUMMIT_000024604	PLTF_2804_000000228
SUMMIT_000004234	SUMMIT_000024608	PLTF_2804_000000604
SUMMIT_000004286	SUMMIT_000024709	SUMMIT_000036553
SUMMIT_000004345	SUMMIT_000024711	SUMMIT_000037079
SUMMIT_000004346	SUMMIT_000024712	SUMMIT_000038167
SUMMIT_000004347	SUMMIT_000024713	SUMMIT_000038170
SUMMIT_000004348	SUMMIT_000024738	SUMMIT_000038171
SUMMIT_000004349	SUMMIT_000024741	SUMMIT_000038290
SUMMIT_000004350	SUMMIT_000024742	SUMMIT_000039786
SUMMIT_000004351	SUMMIT_000024792	SUMMIT_000042884
SUMMIT_000004352	SUMMIT_000024874	SUMMIT_000045830
SUMMIT_000004353	SUMMIT_000024888	SUMMIT_000046309
SUMMIT_000004576	SUMMIT_000024918	SUMMIT_000046407
SUMMIT_000005545	SUMMIT_000024926	SUMMIT_000046427
SUMMIT_000005697	SUMMIT_000024937	SUMMIT_000046536
SUMMIT_000006502	SUMMIT_000024938	SUMMIT_000047435
SUMMIT_000006663	SUMMIT_000024939	SUMMIT_000064691
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Interrogatory 19

Identify each state or federal official or agency (including but not limited to the United States Drug Enforcement Administration, the United States Department of Justice, a United States Attorney's Office, the Ohio Department of Medicaid and its constituent providers, the Ohio Department of Public Safety, the Ohio Attorney General's Office, the State of Ohio Board of Pharmacy, and the State Medical Board of Ohio), insurer, or third party benefit manager who provided information to You about diversion of Prescription Opioids during the Relevant Time Period, including but not limited to information about Suspicious Orders, improper prescriptions, or individuals responsible for diversion of Prescription Opioids. Include in Your response a description of the information and date it was provided.

Response 19

Plaintiff objects that this Interrogatory is overly broad and unduly burdensome. Plaintiff also objects to it seeking information beyond Plaintiff's possession, custody, and control. Plaintiff further objects to this Interrogatory in that it places an undue burden on Plaintiff not proportional to the needs of the case. Further objecting, this Interrogatory contains reference to the undefined phrase "improper prescription" which is subject to varying interpretation. Plaintiff objects to the extent this calls for a legal conclusion by asking for "individuals responsible." Plaintiff also objects to this Interrogatory because certain responsive information may be subject to the law

enforcement privilege and/or other rights and privileges. Plaintiff objects to this Interrogatory in that it calls for information in the National Retail Pharmacy Defendants' possession or control.

Subject to and without waiving all objections, Plaintiff answers as follows: Plaintiff has and will produce documents that its experts will rely upon. In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure. Plaintiff reserves the right to supplement, modify, amend or substitute this answer with non-privileged information responsive to this Interrogatory once the information is available to Plaintiff.

Interrogatory 20

Provide a computation of each category of damages, monetary sums, and injunctive relief that You seek from each National Retail Pharmacy Defendant.

Response 20

Plaintiff objects to this Interrogatory to the extent it calls for Plaintiff to identify the specific conduct or liability of each Defendant. Subject to and without waiving objections, for the identification of the Defendant or Defendants from which relief is sought, Plaintiff refers Defendants to Plaintiff's Second Amended Complaint.

Subject to and without waiving all objections, Plaintiff responds as follows: Plaintiff is conducting a reasonable and diligent search for and has produced or will produce all non-privileged documents that identify, describe, and quantify the monetary and other relief Plaintiff seeks in this case. In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with case management and pretrial orders and the Federal Rules of Civil Procedure.

Subject to and without waiving all objections, Plaintiff answers: Plaintiff's categories of damages in this matter are expected to include, but are not limited to, the following:

- Losses caused by the decrease in funding available for Plaintiff's public services for which funding was lost because it was diverted to other public services designed to address the opioid epidemic;
- Costs for providing healthcare and medical care for patients suffering from opioid-related addiction or disease, including overdoses and deaths;
- Costs of training emergency and/or first responders in the proper treatment of drug overdoses;
- Costs associated with providing police officers, firefighters, and emergency and/or first responders with naloxone – an opioid antagonist used to block the deadly effects of opioids in the context of overdose;
- Costs associated with emergency responses by police officers, firefighters, and emergency and/or first responders to opioid overdoses;
- Costs for providing mental-health services, treatment, counseling, rehabilitation services, and social services to victims of the opioid epidemic and their families;
- Costs associated with law enforcement and public safety relating to the opioid epidemic, including but not limited to attempts to stop the flow of opioids into local communities, to arrest and prosecute street-level dealers, to prevent the current opioid epidemic from spreading and worsening, and to deal with the increased levels of crimes that have directly resulted from the increased homeless and drug-addicted population;
- Costs associated with various public safety and health initiatives related to the opioid epidemic;
- Costs associated with increased burden on Plaintiff's drug courts;
- Costs associated with clean-up of public parks, spaces, and facilities of needles and other debris and waste of opioid addiction;
- Loss of tax revenue due to the decreased efficiency and size of the working population in Plaintiff's communities and due to other impacts on property values and other tax generators for Plaintiff;
- Losses caused by decreased business investment and tax revenue;
- Plaintiff's contributions to the Alcohol, Drug Addiction, and Mental Health Services (ADM) board;
- Increased public safety services, including but not limited to, training, investigations, staffing, jail expenses, dispatch services, and task forces as a result of the opioid epidemic;

- Plaintiff's Health Department costs related to the opioid epidemic, which provide services targeted to patients with substance abuse problems including opioid related matters;
- Costs associated with impact of opioid epidemic on Plaintiff's vehicle fleets;
- Costs for Plaintiff to properly and adequately abate the nuisance created by the opioid epidemic; and
- Costs for child services and foster care for opioid-dependent babies and foster children.

Further subject to and without waiving all objections, Plaintiff answers as follows: In 2014, the County of Summit Alcohol, Drug Addiction and Mental Health Board convened the Summit County Opiate Task Force, a group of individuals and organizations committed to reducing the tragic consequences of opiate addiction in response to the rising public health crisis affecting residents of Summit County. There are over 100 Summit County citizens who are active Task Force members. The Task Force holds quarterly meetings to update the public members and the community on the developments and initiatives to fight the opiate epidemic. The Task Force is comprised of Subcommittees: Advocacy, Criminal Justice, Family Support, Healthcare, Public Awareness and Youth and Youth and Young Adults. Each subcommittee has a Chair or Co-chair. The Task Force addresses the opioid epidemic on multiple fronts including Prevention, Education, Community Outreach, Treatment and Recovery Support. Much of this information regarding this Task Force, its extensive programs and persons involved are available at <https://www.admboard.org/opiate-task-force.aspx>; www.summitcountyopiatetaskforce.org and www.summitcountyaddictionhelp.org.

The Police and Fire Departments in the County have been in the forefront in addressing the opioid public health crisis. Departments have been increasingly challenged to maintain their duties with current personal and have increased law enforcement, fire, and emergency services to respond to drug overdoses. In the City of Akron, the Police Department responded to 2,114 overdoses in 2016 and the first six months of 2017.

Summit County has experienced an increase in drug-related crimes, and has had to increase its spending on drug-related treatment and prevention. The Summit County jail provides services related to opioid detoxification, including preventing suicides believed to be related to opioid withdrawal and now provides Narcan to inmates upon discharge to help prevent future overdoses. Law enforcement, fire, and emergency services personnel spend time with School administrators to educate and address students about the opioid crisis.

The increasing number of cases takes both a physical and mental toll on investigators and first responders. The Summit County Medical Examiner's Office has struggled to retain and recruit qualified death investigators. The Medical Examiner's Office has had to hire four Locum Tenens doctors to assist in the case load. In addition to burn-out, the Summit County Medical Examiner's Office has faced increased costs of overtime, laboratory, toxicology and other costs. The increased case load and decreased staffing cost the Summit County Medical Examiner's Office its National Association of Medical Examiners Accreditation due to lengthy turnaround times and heavy caseloads for pathologists.

The surge of fatal drug overdoses have outpaced the capacity of some local morgues. Coroners and medical examiners in Summit County have had to request the use of refrigerated trailers known as "mobile morgue units." Summit County has had to make use of the mobile morgues at least five separate occasions. These refrigerated trailers double the number of bodies that the County Medical Examiner's Office could otherwise hold at one time.

Resources are diverted from other important uses and agencies will likely have to increase operating levies to fund their services, shifting an additional burden to Summit County residents. These costs do not even contemplate the resources necessary to fully address or abate the epidemic.

Plaintiff has provided various treatment programs and centers. They include an ADM (Alcohol Drug and Mental Health Services Board) Addiction Helpline, Quick Response Team, Police and EMS Naloxone reversals, Residential and Detox Access, Medication Assisted Treatments (MAT) and Interim Crisis Services. Detox beds have been added to the Detox unit and Summit County will host the largest detox center in Ohio. Data contained within amfAR's Opioid & Health Indicators show that in 2014, Summit County had a rate of drug dependence of 2.56% and a rate of non-medical use of pain relievers of 4.82%, and that 87.5% of people who need addiction treatment in the County do not receive it.

In October 2017, Summit County, with a population of over 540,000 citizens, declared a State of Emergency in the county due to the opioid epidemic. Summit County is listed as a High Intensity Drug Trafficking Area with the fourth highest drug overdose death rate and the second highest in fentanyl deaths in the state of Ohio for 2016. Summit County and the City of Akron are intertwined in many of their efforts to address the opioid epidemic. The Summit County Drug Unit is co-located with the Akron Police Department Narcotics Unit. It is a multi-jurisdictional task force that investigates major organized groups involved in the illegal distribution of drugs as well as any alleged violations by persons involved in the use or sale of illegal drugs. The Summit County Drug Unit also has the responsibility to identify and destroy illegal channels of drugs into Summit County, arrest violators and seize their illicit financial assets. The Drug Unit consists of the following agencies: Summit County Sheriff's Office, Summit County Prosecutor's Office, Akron Police Department, The University of Akron Police Department, Barberton Police Department, Cuyahoga Falls Police Department, Stow Police Department, Copley Police Department, Bureau of Criminal Identification & Investigation, FBI, DEA, ATF and the IRS.

In 2016, the Drug Unit created an Opiate Task Force to handle overdose investigations. The Summit County Drug Unit also teamed with the Akron Police Department Task Force to form the Akron/Summit County HIDTA (High Intensity Drug Trafficking Area) Initiative, the largest such initiative in the state of Ohio.

In 2014, the Summit County Prosecutor's Office created an Opiate Unit for low and moderate risk opioid offenders that consists of four distinct phases that provide intensive supervision services upfront and linkage/coordination to community treatment providers. The Opiate Unit has grown to consist of four probation officers with specialized training due to the growing opiate epidemic. The Adult Probation Department was awarded the SMART Grant through the Ohio Department of Rehabilitation and Correction to combat the growing percentage of opiate addicted individuals that come through the program. During 2016, there were 429 cases placed in this specialty unit; of which 295 cases were closed and 95 of those cases consisting of successful completions. Two drug court judges do community outreach regarding opioids and other drugs.

The Drug Court also has a program called Turning Point which is a special court given the responsibility to handle cases involving drug-using/abusing, non-violent offenders, through immediate comprehensive supervision, drug testing, and treatment services, as well as immediate sanctions and incentives. The Faith in Recovery Program provides a spiritual mentor from a local church as an added option for participants. The Valor Court is provided for the specialized needs of those who have served our country, providing access to programs, treatment and interaction with mentors.

The Summit County ADM Board "exists for citizens of Summit County a healthy community in which a continuum of care supports mental wellness and freedom from addiction, with outcomes optimizing use of available resources" – including minimizing opiate related

dependency, deaths and overdoses. The ADM Board was instrumental in establishing the Opiate Task Force in early 2014, which has grown to over 400 members consisting of physicians, pharmacists, faith leaders, judges, prosecutors, police chiefs, school superintendents and multiple agency leaders, public health officials, elected representatives, ADM Board staff and concerned citizens. In 2017, the ADM Board budgeted an additional \$3.2 million to expand detoxification, Quick Response Teams and recovery coaching services.

The ADM Addiction Hotline is run by Akron Summit Community Action and provides a single phone number to enable those seeking addiction services to identify a qualified provider agency for quick access to an assessment and ongoing treatment. The Gloves Up Campaign was launched in 2017 to help promote the ADM Addiction Helpline and other initiatives.

The Summit County Opiate Task Force focuses on awareness, education, treatment and recovery. The Task Force provides pharmacist training on Narcan, expanded use of Vivitrol, addiction education, referral services and public education through partnerships with local pharmacies. The Task Force is encouraging school districts to become involved in prevention and awareness programs. Summit County is adding ten beds to its detox unit, making it the largest detox center in Ohio. The Task Force has quarterly, public meetings to encourage community involvement.

The Akron Municipal Drug Court was initiated in 1995 as a collaborative effort between Summit County Courts, the Akron Police Department, the Akron Prosecutor's Office, the Public Defender's Office, the Akron Municipal Probation Department, the Summit County ADM Board and Oriana House, Inc.

The Akron Quick Response Teams ("QRT") are a collaborative effort between Summit County Public Health, Akron Fire Department and Akron Police Department. This team focuses

on connecting with individuals who have been struggling with addiction to opioids and have recently overdosed. The QRT is also responsible for distribution of naloxone kits.

Summit County treatment and recovery services offered are:

<u>Program</u>	<u>Description</u>
The Akron General Edwin Shaw Rehabilitation Institute	An intensive outpatient program for chemical dependency; monitors Suboxone intake during transition from a detox center.
Akron Medical Center	Inpatient treatment program for opioid addiction.
Akron Urban Minority Alcoholism Drug Abuse Outreach Program (UMADAOP)	Established in 1980 via legislative action to provide substance abuse education, prevention and treatment for African and Hispanic Americans throughout the State of Ohio.
Asian Services in Action, Inc.	A treatment resource with an ambulatory detoxification/treatment center.
Community Health Center	Provides Summit County with a comprehensive treatment plan for the rehabilitation and prevention of addiction; provides medically-assisted treatment for opioid addicted adults; goal is to provide complete methadone maintenance and rehabilitation counseling services to eliminate opioid and other drug use and the spread of infectious diseases.
Cover 2 Resources	A nonprofit organization to spread awareness and educate those touched by the opioid epidemic.
Interval Brotherhood Home (IBH)	An addiction recovery center in operation since 1970 providing an abstinence-based residential treatment program with educational classes for family members.
Mature Services Avenues to Recovery	A drug addiction treatment service.
Oriana House	Summit County's Alternative Corrections Provider offering treatment and recovery for alcoholism and chemical dependency.
Restore Addiction Recovery	A treatment and recovery campus that assists those struggling with addiction through a faith-based program.
Rigel Recovery Services	Provides medication assisted treatment with prescription Vivitrol and an intensive outpatient treatment program specific to the use of opioids.
Summa Akron City Hospital	Inpatient detox for opioid addiction.

Summit County Public Health	Member of the Opiate Task Force and provides quarterly reports on drug overdoses. Oversees Project DAWN which is a community-based drug overdose prevention and education project where participants receive training on recognizing the signs and symptoms of overdose and administering intranasal Naloxone/Narcan.
Summa Health System	The Summa Health Behavioral Health Institute provides inpatient and outpatient services to combat a variety of addiction disorders; operates a Vivitrol Clinic in Akron; the Summa Community Leadership Institute endeavors to involve the community in fighting the opioid epidemic.
Summit Safe Needle Exchange Program	A free, anonymous syringe exchange program which includes overdose prevention training and risk reduction counseling.
Summit Psychological Associates	An outpatient medically assisted treatment (Vivitrol) program for Oriana House.
Summit County Community Partnership	A consortium of community resources committed to preventing substance abuse using evidence based prevention techniques, information and activities.
Jake's Reach	An Akron-based opiate addiction resource group.
Hope United	A foundation founded to fight drug addiction.

The following table describes other examples of the efforts made to address public health and safety hazards of the opioid epidemic caused by the wrongful conduct of Distributor Defendants.

Jurisdiction	Efforts to Address Opioid Epidemic
Summit County	<ul style="list-style-type: none"> Summit County Alcohol, Drug Addiction and Mental Health Board: Quick Response Teams, DAWN, Addiction Helpline; Opiate Task Force and the planning, maintaining and executing responses to the opioid epidemic; purchase of Narcan; manages waitlists for residential treatment facilities; additional training, education and treatment; Summit County Medical Examiner: increased number of deaths caused by the opioid epidemic for the Summit County Medical Examiner's office to process and investigate; additional staffing and resources, additional costs for contractors/vendors;

Jurisdiction	Efforts to Address Opioid Epidemic
	<ul style="list-style-type: none"> Summit County Prosecutors: increased caseload and prosecutions relating to the opioid epidemic; Summit County Court of Common Pleas (including probation and specialty courts, like drug court): increased caseload and probation services relating to the opioid epidemic; Opioid Unit in adult probation department; two drug court judges do community outreach re opioids and other drugs; Indigent Defense – increased County expenditures to fund this Court program for indigent defendants; Summit County Juvenile Court (including probation and specialty courts): increase in number of parents participating in Family Reunification Through Recovery Court due to opioid use; increase in staff trainings related to opioid use; Summit County Children Family Services: host Northeast Ohio Regional Training Center which provides trainings related to opioids, 25% of the staff trainings they do relate to opioids; social workers who exclusively deal with families and substance abuse issues; collaborate with juvenile court program, Family Reunifications through Recovery; Oriana House; provides licensure hours for Close Up which addresses opioids increased costs due to increased placement of children abused and neglected due to opioid addictions; Summit County Sheriff: services, including but not limited to, training, investigations, staffing, jail expenses, dispatch services, task force as a result of the opioid epidemic; members of Quick Response Team; DARE education; drug task force members meet with community organizations to discuss opioids; drug take back days; implement House Bill 277 aka Good Samaritan Law; receive Narcan training; Summit County General Health District: purchase of Narcan; Quick Response Team; Syringe Harm Reduction Program; educational campaigns, expanded medically assisted treatment programs; and Summit County Executive: Incident Management Assistance Team (IMAT) coordinates activities of the Opiate Task Force and the Addiction Counsel.
City of Akron	<ul style="list-style-type: none"> Opioid-focused Quick Response Team (QRT); Purchases of Narcan, drug testing kits, and Immunity Hearing Requirement forms; Increased Police/Fire/EMS service calls for overdoses; Increased Police Division services for opioid investigations, including training, detailing of staff to task forces;

Jurisdiction	Efforts to Address Opioid Epidemic
	<ul style="list-style-type: none"> • Safety Communications handling of increased dispatches and related Police/Fire/EMS support; • Law Department Criminal Division's increased prosecutions relating to the opioid epidemic; • Municipal Court's increased caseload and probation load relating to the opioid epidemic; • Planning and executing a response to the opioid epidemic, including community educational awareness by Police, the Mayor's office, and other city departments; and • Funding of third party entities that provide various support services related to the opioid epidemic, including Oriana House, Interval Brotherhood Home, etc.

Subject to and without waiving all objections, Plaintiff identifies the following documents containing information responsive to this Interrogatory pursuant to Federal Rule of Civil Procedure 33(d):

Jurisdiction	Supporting Documents	
Summit County	Title	Bates Number
	County of Summit Operating Budget	<u>SUMMIT 000014151 (2006)</u> <u>SUMMIT 000014772 (2007)</u> <u>SUMMIT 000015385 (2008)</u> <u>SUMMIT 000015990 (2009)</u> <u>SUMMIT 000001728 (2010)</u> <u>SUMMIT 000002310 (2011)</u> <u>SUMMIT 000002922 (2012)</u> <u>SUMMIT 000000207 (2013)</u> <u>SUMMIT 000004576 (2014)</u> <u>SUMMIT 000005697 (2015)</u> <u>SUMMIT 000006663 (2016)</u> <u>SUMMIT 000007551 (2017)</u> <u>SUMMIT 000008414 (2018)</u>
	County of Summit Annual Informational Statement	<u>SUMMIT_000013699 (2007)</u> <u>SUMMIT 000013877 (2008)</u> <u>SUMMIT 000001199 (2010)</u> <u>SUMMIT 000001605 (2011)</u> <u>SUMMIT 000001329 (2012)</u> <u>SUMMIT_000001461 (2013)</u> <u>SUMMIT_000004353 (2014)</u> <u>SUMMIT_000005545 (2015)</u> <u>SUMMIT_000006502 (2016)</u>

Jurisdiction	Supporting Documents	
	Summit County Court of Common Pleas Annual Report	SUMMIT_000111332 (2006) SUMMIT_000111364 (2007) SUMMIT_000111417 (2008) SUMMIT_000111475 (2009) SUMMIT_000003958 (2010) SUMMIT_000004014 (2011) SUMMIT_000004070 (2012) SUMMIT_000004126 (2013) SUMMIT_000004182 (2014) SUMMIT_000004234 (2015) SUMMIT_000004286 (2016)
	Purchase Orders: Oriana House	SUMMIT_000012888 SUMMIT_000012894 SUMMIT_000012901 SUMMIT_000012907 SUMMIT_000012912 SUMMIT_000012941 SUMMIT_000012943 SUMMIT_000012948 SUMMIT_000012954 SUMMIT_000012978 SUMMIT_000013002 SUMMIT_000013022 SUMMIT_000013026 SUMMIT_000013055 SUMMIT_000013061 SUMMIT_000013075 SUMMIT_000013081 SUMMIT_000013123 SUMMIT_000013128 SUMMIT_000013135 SUMMIT_000013142 SUMMIT_000013440 SUMMIT_000013551 SUMMIT_000013575 SUMMIT_000013087 SUMMIT_000013095 SUMMIT_000013115
	Summit County Public Health Annual Report	SUMMIT_000018676 (2011) SUMMIT_000017896 (2013) SUMMIT_000018430 (2014) SUMMIT_000018440 (2015)
	County of Summit Alcohol, Drug Addiction & Mental Health Services Board – Annual Budget Review	SUMMIT_000018966 (2007) SUMMIT_000019112 (2008) SUMMIT_000019258 (2009) SUMMIT_000019388 (2010) SUMMIT_000042884 (2014) SUMMIT_000019490 (2015) SUMMIT_000019580 (2016)

Jurisdiction	Supporting Documents		
		SUMMIT_000019668 (2017)	
	County of Summit Alcohol, Drug Addiction & Mental Health Services Board – Budget	SUMMIT_000182167 (2016)	
	ADM – Historical Revenues and Expenditures	SUMMIT_000290130	
	Summit County Court of Common Pleas – Juvenile Division – Annual Report	SUMMIT_000087479 (2016)	
	Summit County Sheriff’s Office Annual Report	SUMMIT_000070610 (2014)	
	Summit County Children Services Annual Report	SUMMIT_000111080 (2012) SUMMIT_000111088 (2013) SUMMIT_000003930 (2014) SUMMIT_000003942 (2015) SUMMIT_000003954 (2016)	
City of Akron	Title	Bates Number	
	City of Akron Operating Budget	AKRON_000000003 (2010) AKRON_000000576 (2011) AKRON_000001104 (2012) AKRON_000001620 (2013) AKRON_000002119 (2014) AKRON_000002874 (2016) AKRON_000003228 (2017)	
	City of Akron Ad Hoc Transaction Report – By Vendor	AKRON_000004034	
	Community Health Center Annual Report	AKRON_000004134 (2004) AKRON_000004241 (2010)	
	Agreement to Provide Community Correctional Services w/ Oriana House	AKRON_000209219 (2006) AKRON_000209273 (2007) AKRON_000209180 (2008) AKRON_000209190 (2009) AKRON_000209313 (2010) AKRON_000209348 (2011) AKRON_000209246 (2012)	

Jurisdiction	Supporting Documents	
		AKRON_000209382 (2013) AKRON_000209435 (2014) AKRON_000209328 (2015) AKRON_000209282 (2016) AKRON_000004370 (2018)
	Extension Agreement w/ Oriana House	AKRON_000209304 (2008) AKRON_000209297 (2018)

Subject to and without waiving all objections, Plaintiff responds that this Interrogatory is contention discovery more appropriately answered once discovery is complete. *See* Fed. R. Civ. P. 33(a)(2). In addition, discovery is ongoing and this information will be the subject of fully-supported and detailed expert witness opinion(s) that will be disclosed in accordance with the scheduling orders in this case and the Federal Rules of Civil Procedure. As discovery continues, Plaintiff will produce a trial witness list and expert reports pursuant to the scheduling orders in this case. Plaintiff reserves the right to supplement, modify, or amend this response as discovery proceeds.

Dated: September 26, 2018

/s/ Linda Singer

Linda Singer

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CERTIFICATE OF SERVICE

I, Colleen Hemelgarn, certify that on September 26, 2018, I caused the foregoing to be served via electronic mail on Defendant's Liaison Counsel pursuant to the Case Management Order in this case (Dkt. No. 232).

/s/ Colleen Hemelgarn/